

A.4.1



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

**Central District Office**

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

March 23, 2007

Matthew D. Knecht  
HzW Environmental Consultants, LLC on behalf of Campus Partners  
6105 Heisley Road  
Mentor, OH 44060

**Re: Notice of Deficiency  
Closure Plan  
Decorative Surfaces International  
OHD004294351**

Dear Mr. Knecht:

On February 27, 2007, Ohio EPA received from HzW Environmental Consultants, LLC on behalf of Campus Partners/Decorative Surfaces International a closure plan for storage pads in multiple buildings throughout the facility located at 1280 North Grant Avenue, Columbus, Ohio.

Ohio EPA, Division of Hazardous Waste Management (DHWM) has conducted a review of the above referenced closure plan, and has determined it to be incomplete and technically inadequate.

We have enclosed, as an attachment to this correspondence, detailed deficiency comments on the closure plan. Please provide a revised closure plan addressing all areas indicated in the deficiency comments. Ohio Administrative Code (OAC) rule(s) 3745-66-12 requires that such a revised closure plan be submitted to the Director of Ohio EPA for approval within thirty (30) days of the receipt of this letter.

The revised closure plan shall be prepared in accordance with the following editorial protocol or convention:

- 1) Old Language is over-struck, but not obliterated.
- 2) New Language is capitalized.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

- 3) Page headers should indicate date of submission.
- 4) If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The revised closure plan should be submitted to:

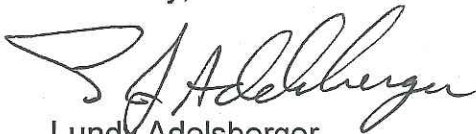
Ohio Environmental Protection Agency  
Division of Hazardous Waste Management  
Attention: Pamela Allen, Manager  
Regulatory and Information Services Section  
P.O. Box 1049,  
Columbus, Ohio 43216-1049

A copy should also be sent to: Elizabeth Lamerson, Ohio EPA, Central District Office, P.O. Box 1049, Columbus, Ohio 43216-1049.

Ohio EPA will, pursuant to OAC rules 3745-66-12, review the re-submitted plan and issue a final action approving or modifying the plan. Ohio EPA's final action on the re-submitted plan is appealable to the Environmental Review Appeals Commission.

If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Elizabeth Lamerson at (614) 728-3882 or Dave Sholtis at (614) 644-2937.

Sincerely,



Lundy Adelsberger  
Central District Office  
Division of Hazardous Waste Management, Supervisor

- c: Pamela Allen, DHWM, Central File, Ohio EPA  
Dale Meyer, U.S. EPA, Region 5  
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA  
Dave Sholtis, Ohio EPA, DHWM, Central Office  
Craig Butler, Ohio EPA, Central District Office  
Elizabeth Lamerson, Ohio EPA, Central District Office  
Chris Bulinski, Ohio EPA, Central District Office  
Fred Myers, Ohio EPA, Central District Office  
Mike Reese, City of Columbus

## **ATTACHMENT A**

### **Closure Plan Technical Adequacy Comments Decorative Surfaces International OHD004294351**

#### **General Summary of Review**

Ohio EPA reviewed Decorative Surfaces International (submitted by Campus Partners) Closure Plan for completeness and technical adequacy. The plan was found to be technically inadequate. Ohio EPA found the following deficiencies in Decorative Surfaces International Closure Plan.

#### **Specific Review Comments**

1. Page 1, section 1.0 states the aboveground portion of the structures will be razed during 2006. Since 2006 is past, please update the plan with a current year for demolition.
2. There are numerous subterranean rooms located throughout the facility. All hazardous waste floor slabs which may be collapsed into the rooms must be decontaminated prior to demolition.
3. Buildings, such as Building 58 (section 3.4), have multiple levels. The closure plan states "any exposed poured concrete floor slab surface of Building 58 that remains after above-grade building demolition activities will be subject to the activities contemplated in this Closure Plan." It is unclear if the tiers in this building along with other tiered buildings will be demolished to the ground or if all levels of the concrete pads will be left after demolition. Please clarify if the tiered building slabs will be left to scarify. If the tiers will be demolished, the tiered levels must be scarified/decontaminated prior to demolition.
4. Section 3.4 states "Since the August 2005 Weston report only references the presence of waste materials being stored or managed on the lowest level, this base tier is the only area in Building 58 considered subject to closure activities." Ohio EPA has records including photos of drums on the second level in Building 58. During Ohio EPA's May 21, 2004 visit, we noted unknown drums on the second level of Building 58. The report and photo are attached. The second tier of Building 58 must be decontaminated prior to demolition. Photos of this room are attached.
5. As noted in the closure plan in section 3.8, Building 6 has a tiered flooring system. All levels must be addressed prior to demolition. Building 15 on the other hand is above Building 6. Building 15 must also be scarified/decontaminated prior to demolition. A photo is attached showing the location of Building 15 above Building 6.



6. Building 85 is elevated (not at grade). Will the slab of Building 85 be left for scarification or will the building be leveled to the height of the roadway? If this concrete pad will be leveled to grade, the concrete pad must be scarified prior to demolition.
7. The closure plan lists the parameters, but only the extraction method is listed for TCLP metals, VOCs, and SVOCs. The closure plan does not address the QA/QC. Please insert the test methods and QA/QC information in the closure plan.
8. If composite samples from the roll off boxes are deemed hazardous waste, these composite samples will not be acceptable for Land Disposal Restriction (LDR) determinations. LDR samples must be discrete grab samples. Please address this issue in the plan.
9. The sampling is discussed in section 6.0. This section states that "grab samples of the residual material will be collected on a random basis, but not less than one grab sample for each ten loads of abraded concrete residue deposited into the roll-off container via skid-steer loader." It goes on to say the individual grab samples will be composited. One grab sample every ten loads to be composited would not be representative of the entire roll off box. One grab sample from each skid-steer load and then composited would be more representative to determine if the roll off box is characteristically hazardous. Please address this issue.
10. Section 7.0 of the closure plan contains the schedule for closure activities. This section states the closure activities are not going to commence until March 2008. As discussed with Matt Knecht, demolition is set to begin within the next three weeks. If the buildings will be demolished early this year, what reason(s) would closure need to be postponed until March 2008? If the buildings are demolished, what methods will you take to control runoff and run on of water once the pads are exposed to the elements?
11. This closure plan does not list dimensions of the buildings (container storage areas), only square footage. Please add the dimensions of each building (container storage area).
12. Page 13 of the closure plan states "The Ohio EPA would, if required, be provided with five (5) days notice in advance of any "critical activities" (to be identified by the Ohio EPA)." All closure scheduled items are "critical activities." Please add to the closure schedule: "demolition of the buildings, surveying the concrete pads after demolition, the scarification process, decontamination of the equipment, sampling events, and final inspections after scarification". Please also state when a Professional Engineer will be present.
13. Page 17 of the closure plan states that the polyethylene sheeting from the decontamination pads will be placed in with the PPE in 55-gallon drums and disposed of "off-Facility." What does "off-Facility" mean? PPE and decontamination pad wastes are considered hazardous waste unless shown to be otherwise.

14. Are the roll off boxes lined with plastic? If so, please include this information in the closure plan. If not, please address the issue of cleaning the roll off boxes, if necessary, after they are empty and sealing of the end gate to prevent releases.
15. The closure plan states on page 13 that a "formal closure report and Profession Engineer's certification of closure submitted to Ohio EPA." You must also include in the closure plan that the certification will include the wording found in OAC 3745-50-42(D). The closure plan must also state the status of the unit and the facility upon completion of closure. You must also indicate in the closure plan what documentation will be submitted with the closure certification.
16. The financial assurance information in section 19.2 of the closure plan is not sufficient. The owner/operator of the property may demonstrate financial assurance from one of the following financial assurance mechanisms: Trust Fund, Surety Bonds, Letter of Credit, Insurance, Financial Test and Corporate Guarantee. The owner/operator is also required to maintain sudden and/or nonsudden accidental liability coverage until certification of final closure. Please include the financial assurance mechanism and liability coverage you will be using.
17. Figure 5 states building "65" when in fact it should read building "85." Please make this correction.
18. Buildings 5 and 36 are not outlined on the surveyed map (figure 5). Building 36 is mentioned in the list on page 3 and on page 6, but it is not included in Figure 5. Building 5 is not addressed in the closure plan or in figure 5. Please address these issues.
19. Figure 5 (surveyed map) shows building 15 and building 6, but this does not reflect the true area of either building's size. Building 6 does not appear to be drawn on figure 5 and the surveyed line does not follow building 15 walls. Please address this issue.
20. The boundary line for building 101 appears to differ between figure 4 and figure 5. Building 101 in figure 4 does not incorporate the driveway to the north. It is included in figure 5. Please address this discrepancy.
21. Where is the starting point(s) for the survey in figure 5? Please include the meets and bounds in the closure plan. Ohio EPA must obtain this information prior to demolition of the buildings so we can use this information for the scarification process.
22. Map legends must include all icons marked on the drawings. Please accurately identify all icons on the drawings (i.e., what are the x marks on Figure 5, etc.?)
23. All residue/debris must be removed prior to demolition unless all construction debris is sent to a licensed sanitary landfill. Construction and demolition debris does not include debris on the floor. If residue/debris is removed, it must be evaluated prior to disposal. An example of residue on the floors in the building is shown in attached photos.
24. Please add to sections 11.0 through 18.0 that the underlying and surrounding soils, the groundwater, and the surface water must be cleaned to the approved applicable VAP standards, in accordance with OAC 3745-300.



3-21-07 DSI Building 58 three floors.



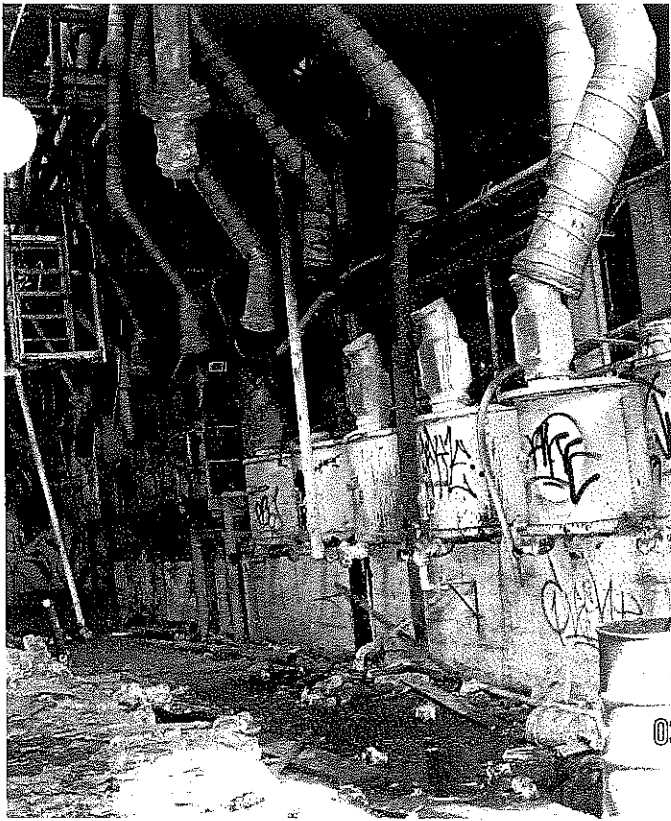
3-21-07 The second floor of building 58.



3-21-07 View of the third floor in building 58.



3-21-07 View of the ramp going down to lower levels under building 58.



3-21-07 First floor of Building 6.



3-21-07 Multiple floors in building 6. The room opening at the top is Building 15.



3-21-07 View inside of Building 15.

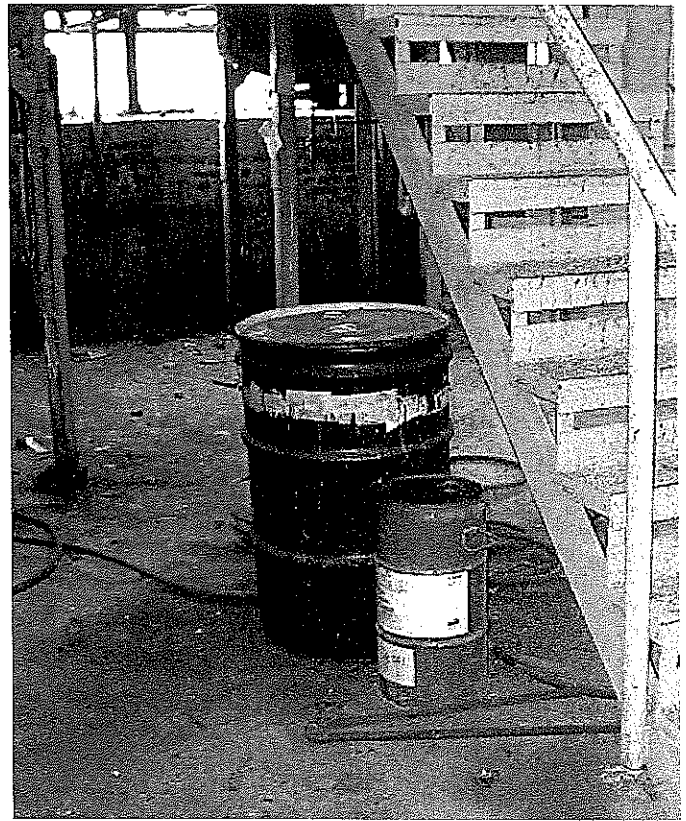


More views of Building 6. Debris on the floor.





More views of Building 6.



5-21-04 The 55-gallon drum in Bldg. 58 second floor was about half full containing a material with a solvent like odor.



10-9-03 Unknown drums in Bldg. 58.



10-9-03 Close up of unknown sticky substance, in addition to oily mixture in Bldg. 6.



**Decorative Surfaces International (DSI)**  
**Site Visit**  
**May 21, 2004**  
**Lundy Adelsberger and Elizabeth Lamerson**

I spoke with Jim Ramey on Thursday (5/20/04). He and Ryan were in Portsmouth that day so we scheduled a meeting for Friday. Mr. Ramey told me that he had every drum moved into Building #85. He also said they closed every sump and put caution tape around the open pits.

Lundy and I arrived at the facility around 9:20 a.m. Lundy and I met with Jim Ramey. We went into Mr. Ramey's office. He began by telling us that the clay soil sitting on his desk was taken at a point on site approximately 12" deep. He said they were going to send a sample off site to have it analyzed. He said they figured if it can back ok then the rest of the site might not be contaminated.

Mr. Ramey stated he wanted to pump out the pits that contain an oil/water material and place it in totes. We asked how many totes they had. Mr. Ramey said they had about 15 totes. We asked what they would do if they ran out of totes. He said they would use open top drums with lids. He said that they have put caution tape around the open pits. We told him we would look at the pits but the idea was to pump out the pits or put empty drums all the way around the pits not caution tape.

Mr. Ramey told us all of the sumps were covered with plywood.

He told Lundy and me that Ryan was in Portsmouth. He said we could show ourselves around. We asked if he could have the gate to Building #85 unlocked. He said that he would have someone unlock the gate.

Lundy and I walked back to look at the sumps and the totes behind Building #58. The sumps were closed. They had placed a piece of plywood on top of the sumps. They had drilled holes in the plywood and the pipe of the sumps and secured the plywood with wire to keep them closed. The five totes contain an oil water substance (see photo).

Building #58 still contained a 55-gallon drum that was approximately half full with an unknown material that had a strong solvent like odor.

Building #35 contains the unknown white material that is in a pile on the floor. This building also contained an R539 Flexguard F60 drum and a drum that is three fourths full of a gel like substance that also had a strong solvent like odor.

Building #38 contains a 55-gallon drum of aluminum flake, three 55-gallons drums of mineral spirits, and one 55-gallon drum that is labeled Hazardous Waste.

Building #33 contains many drums of unknown material. Building #15 also contains product drums of unknown material.

Lundy and I saw a sump that was not covered. The sump was located on the south side of the boiler house. We found three drums of unknown material in the boiler house.

Building #23 still contained eight to ten 55-gallon drums of MEK and MIBK. Brad had asked Ryan Ramey to move these drums to Building #85.

Building #95 still contains empty and full drums. We had asked the Ramey's to sort through these drums and move the drums that contained some material to Building #85. There was no change to the drums.

Building #113 contained the same drums as the week before.

We found four 55-gallon drums labeled Hazardous Waste in Building #57. One of the drums was also labeled plastizer oil and another drum was also labeled heat transfer oil.

The pit in Building #104 was marked off with caution tape. The Ramey's have move empty drums to the corners of the pit and wrapped caution tape around the drums and pit.

Lastly, we looked in Building #85. There appeared to be a few more drums added to this building. We noticed the bio hazardous waste boxes were sitting in water. The roll off box that was located behind Building #85 was gone.

Lundy and I returned to Mr. Ramey's office. We informed him that there are still many drums located in various parts of the facility. He said they would work to get all of the drums moved to Building #85. We also informed him that the caution tape around the pit was not what we had in mind. We stated that the tape can be seen in the daytime, but at night someone could still walk right through the tape and fall into the pit. Mr. Ramey stated they want to pump out the pit and fill the pit with concrete blocks from tearing down one of the rooms inside of the building. He said that he would call me before they pumped out the pits so I could come out to the site. I told him I would appreciate a call. We informed Mr. Ramey that the sump on the south side of the boiler house was uncovered. He said that he would get the sump covered. I told him that Brad would probably want to come back to the facility next week or the week after. I told him we would be talking with him soon. Lundy and I left the facility.

A.4.1

AUG 26 1994

HRP-8J

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
Post Office Box 208  
Columbus, Ohio 43201

0 HD 004 294351

Dear Mr. Thomas:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Certification of Closure, submitted by Columbus Coated Fabrics (CCF), for closure of the hazardous waste container storage area (S01).

Based on a review of the CCF closure certification and supporting documentation, it appears that CCF has closed the hazardous waste container storage area (S01) in accordance with its Federal Part B permit effective October 27, 1984, the approved closure plan and the appropriate hazardous waste rules pertaining to closure. With the closing of the hazardous waste container storage area (S01), CCF no longer has any Resource Conservation and Recovery Act (RCRA) regulated units at the facility requiring a Part B permit. Therefore, upon expiration of the Federal Part B permit on October 27, 1994, CCF will be removed from the universe of permitted facilities. CCF will be considered and regulated as a Large Quantity Generator of hazardous waste. A Large Quantity Generator is a facility that generates 1000 kg/mo or more of hazardous waste.

Please be advised that approval of this closure does not release CCF from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which such waste was placed in the unit.

If you have any questions concerning this matter, please contact Stephen Bouchard of my staff, at 312-886-4437.

Sincerely yours,

ORIGINAL SIGNED BY  
GEORGE J. HAMPER

Karl E. Bremer, Chief  
RCRA Permitting Branch

cc: Andrew Kubalak, OEPA-CDO  
Ed Lim, OEPA-CO  
Tom Crepeau, OEPA-CO

CONCURRENCE REQUESTED FROM RPB			
SC/BR SECRTY			<i>XX 8/10/94</i>
OTHER STAFF	RPB STAFF	RPB SECTION CHIEF	RPB BRANCH CHIEF
<i>mm 08/18/94</i>	<i>CMB 8/18/94</i>	<i>CDP/HC 8/19/94</i>	<i>CDP KES 8/19/94</i>



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
AX (614) 644-2329

RECEIVED  
WMD RCRA  
RECORD CENTER

JUN 18 1993

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

April 2, 1993

Re: Columbus Coated Fabrics  
US EPA ID No.: OHD004294351  
Ohio ID No.: 01-25-0145  
Completion of Closure

Columbus Coated Fabrics  
Attn: Mr. Grover Thomas  
PO Box 208  
Columbus, Ohio 43216

Dear Mr. Thomas:

According to our records, on April 17, 1992, the Director of Ohio EPA approved a closure plan submitted by Columbus Coated Fabrics for their hazardous waste container storage area located at 1280 North Grant Avenue, Columbus, Ohio 43201. On November 24, 1992 and February 10, 1993, Columbus Coated Fabrics submitted to the Director certification documents stating that the hazardous waste drum storage area had been closed according to the specifications in the approved closure plan. Ohio EPA District Office personnel completed a certification of closure inspection and a review of documents pertaining to the hazardous waste drum storage area on February 17, 1993. Based on this inspection and review, the Ohio EPA has determined that the hazardous waste drum storage area has been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and Columbus Coated Fabrics will maintain the status of a large quantity generator (LQG) of hazardous waste.

You should continue to use the identification number assigned to you for purposes of Ohio EPA manifest, recordkeeping, and reporting requirements as appropriate.

If you have any questions concerning your current status, please contact the Ohio EPA, Central District Office, Attn: Andy Kubalak, 2305 Westbrooke Drive, Bldg. C, Columbus, Ohio 43228, telephone number (614) 771-7505.

As specified in OAC Rule 3745-66-40, Columbus Coated Fabrics will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this facility, in accordance with Rules 3745-66-43(H) and 3745-66-47(E) of the OAC.







State of Ohio Environmental Protection Agency

Central District Office

Street Address:

2305 Westbrooke Drive, Building C  
Columbus, Ohio 43228  
614-771-7505 FAX 614-771-7571

Mailing Address:

P.O. Box 2198  
Columbus, Ohio 43266-2198

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

RECEIVED JUN 18 1993  
WMD RCRA  
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*new*

February 22, 1993

RE: FRANKLIN COUNTY  
COLUMBUS COATED FABRICS  
POST-CERTIFICATION INSPECTION  
OHD004294351 / 01-25-0145

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
Post Office Box 208  
Columbus, Ohio 43201

RECEIVED

FEB 26 1993

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Mr. Thomas:

On November 23, 1992 Columbus Coated Fabrics (CCF) submitted a certification, dated November 17, 1992, for closure of the hazardous waste container storage area (S01). On February 12, 1993, CCF submitted additional closure certification documentation, dated February 10, 1993, in response to our request for this additional documentation, dated December 8, 1992.

On February 17, 1993, Ohio EPA, Central District Office conducted a post certification inspection at CCF.

Based on a review of the CCF closure certification and the post certification inspection, both referenced above, it appears that CCF has closed the hazardous waste container storage area (S01) in accordance with the approved closure plan and the appropriate hazardous waste rules pertaining to closure.

Please call me at (614) 771-7505 if you have any questions regarding this matter.

Sincerely,

*Andrew D. Kubalak*

Andrew D. Kubalak  
Division of Hazardous Waste Management  
Central District Office

ADK/pan  
Doc004/15

cc: Harriet Croke, U.S. EPA Region V,  
Chief, Permitting Section  
Steve Bouchard, U.S. EPA Region V,  
Ohio Permitting Section  
Tom Crepeau, OEPA, Data Management Section  
Ed Kitchen, OEPA, Technical Assistance Section  
Pam Allen, OEPA, Enforcement Section



Printed on recycled paper



State of Ohio Environmental Protection Agency

Central District Office

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Street Address:

2305 Westbrooke Drive, Building C  
Columbus, Ohio 43228  
614-771-7505 FAX 614-771-7571

Mailing Address:

P.O. Box 2198  
Columbus, Ohio 43266-2198

George V. Voinovich

Governor

Donald R. Schregardus

Director

RECEIVED

DEC 14 1992

December 8, 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA. REGION V

RE: FRANKLIN COUNTY  
COLUMBUS COATED FABRICS  
OHD004294351

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
Post Office Box 208  
Columbus, Ohio 43201

Dear Mr. Thomas:

Ohio EPA, CDO has completed our review of the Columbus Coated Fabrics (CCF) closure certification dated November 17, 1992, which was received by our office on November 23, 1992. This certification was submitted following closure of the container storage area. We have the comment listed below following our review of the closure certification report:

The closure plan, dated January 13, 1992 and approved by Ohio EPA Director Schregardus on April 17, 1992 included a list (Table 1 - Page 6) of hazardous constituents to include for analysis during closure activity. Warfarin, a P001 hazardous waste, is included in this table. A footnote to this table indicates that Warfarin has never been stored on the drum storage pad.

The closure certification report indicates that Warfarin is not included in standard U.S. EPA Test Methods, and was not quantified by the laboratory.

To substantiate your claim that Warfarin was never stored on the drum storage pad, please provide a certification statement which indicates that a complete review of CCF hazardous waste manifests and CCF's operating records indicates that Warfarin has never been generated on site, or stored on the drum storage pad.

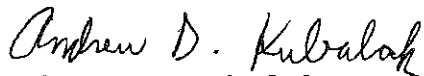


Mr. Grover Thomas  
RE: Columbus Coated Fabrics  
December 8, 1992  
Page 2

This certification shall include the statement found in OAC  
3745-50-42(D).

If you should have any questions, please feel free to call  
me at this office.

Sincerely,



Andrew D. Kubalak  
Division of Hazardous Waste Management  
Central District Office

ADK/bjw

Doc008/27-28

cc: Harriet Croke, Chief, Ohio Permitting Section, USEPA  
Steve Bouchard, USEPA, Region V  
Randy Meyer, DHWM, CO





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

Steve

RECEIVED

AUG 18 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V  
George V. Voinovich  
Governor

RE: CLOSURE PLAN EXTENSION  
COLUMBUS COATED FABRICS  
OHD004294351

August 13, 1992

Mr. C.R. Springer  
Manager Environmental  
Environmental Affairs  
Borden Packaging and Industrial Products  
1050 Kingsmill Parkway  
Columbus, Ohio 43229-1143

CERTIFIED MAIL

Dear Mr. Springer:

On July 1, 1992, Columbus Coated Fabrics (CCF) submitted a request for an extension to the closure period specified in the closure plan approved on April 17, 1992 which expires on October 14, 1992. The extension request was submitted pursuant to the OAC Rule 3745-66-13(B), as closure of the container storage area will require longer than the 180 day period specified in OAC Rule 3745-66-13.

CCF has requested that U.S. EPA modify the previously approved closure plan, incorporated within the federal Part B Permit, before commencing closure. CCF has requested that Ohio EPA extend the closure period to 180 days following both the Part B Permit Modification approval from U.S. EPA, and Ohio EPA approval of the two changes to the approved closure plan which are described in your June 22, 1992 letter.

An extension of time allowed for closure is hereby granted for 180 days from the date that U.S. EPA approves the Part B permit modifications.

Please note that the two modifications to the closure plan which you mention in your letter of June 22, 1992 have already been incorporated into the plan which Ohio EPA approved on April 17, 1992, therefore Ohio EPA does not need to respond further to the modification request.

Please be advised that approval of this closure extension request does not release CCF from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the  
official document as filed in the records of the Ohio  
Environmental Protection Agency.

By: Mary Carvin Date 8-13-92

Mr. C.R. Springer  
Manager Environmental  
Environmental Affairs  
Borden Packaging and Industrial Products  
Page 2


When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The owner or operator certification shall follow the format specified in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attention: Mr. Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the ground upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal must be filed at the following address:

Environmental Board of Review  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

Any questions regarding this matter should be directed to Andrew D. Kubalak at Ohio EPA, Central District Office at (614) 771-7505.

Sincerely,

  
Donald R. Schregardus  
Director

DRS/ADK/sc

cc: Mr. Grover Thomas, Columbus Coated Fabrics  
Tom Crepeau, Ohio EPA, CO, DHWM  
Section Chief, Ohio Permit Section, U.S. EPA, Region V  
Randy Meyer, Ohio EPA, CO, DSHWM  
Andrew D. Kubalak, Ohio EPA, CDO, DHWM

3LH/5-6

I certify this to be a true and accurate copy of the  
official document as filed in the records of the Ohio  
Environmental Protection Agency.

By: Mary Cavin Date 8-13-92

AUG 13 1992

FILED DIRECTOR'S OFFICE



BORDEN PACKAGING and INDUSTRIAL PRODUCTS  
DOMESTIC AND INTERNATIONAL  
DIVISION OF BORDEN, INC.



C. RICHARD SPRINGER  
MANAGER—ENVIRONMENTAL  
ENVIRONMENTAL AFFAIRS

June 22, 1992

Donald Schregardus, Director  
Ohio Environmental Protection Agency  
P.O. Box 1049  
1800 Water Mark Drive  
Columbus, OH 43266-0149

Re.: Closure Plan  
Columbus Coated Fabrics  
OHD 004 294 351

Dear Mr. Schregardus:

We have received your approval letter of April 17, 1992, regarding the Revised Closure Plan for the Hazardous Waste Container Storage Area (HWCSA) submitted for the above mentioned facility. However, U.S. EPA Region 5 has indicated that we are required to modify the previously approved facility closure plan incorporated within the facility's Part-B permit before commencing closure.

Additional requirements under consideration by U.S. EPA include:

1. Modification of the approved facility closure date for the HWCSA from the year 2050 to the year 1992.
2. Modification of the approved list of hazardous waste disposal/recycling facilities and transporters contained in the Part B Permit to include the updated list contained in the Revised Closure Plan.

Additionally, the Revised Closure Plan specified 180 days to complete closure following approval by the OEPA. It is hereby requested that the 180 day closure period will commence as soon as we receive both Part B permit modification approval from U.S. EPA and your approval of the above additions.

Letter to Donald Schregardus  
June 22, 1992  
Page Two

If you require additional information for your review, please do not hesitate to call me or Rick Spencer of T.M. Gates, Inc. (513) 248-1025.

Sincerely,

*C. R. Springer*

C. R. Springer

CRS:ckb

Encl.

cc: Mr. Andrew Kubalak, OEPA, CDO  
Mr. Tom Crepeau, OEPA, CDO  
Mr. Steve Roth, OEPA, CDO  
Ms. Lisa Pierard, U.S. EPA, Region 5  
Mr. Joel Morbito, U.S. EPA, Region 5  
Mr. Steve Bouchard, U.S. EPA, Region 5

MAY 08 1992

HRP-8J

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
P.O. Box 208  
Columbus, Ohio 43201

RE: Closure Plan  
Columbus Coated Fabrics Facility  
Columbus, Ohio  
OHD 004 294 351

Dear Mr. Thomas:

Thank you for submitting a revised closure plan regarding the planned closure of the Hazardous Waste Container Storage Area (HWCSA) at the Columbus Coated Fabric (CCF) facility in Columbus, Ohio. The closure plan which was submitted and approved with modifications by the Ohio Environmental Protection Agency on April 17, 1992, contains minor variations from the closure plan that is contained within the Federal RCRA permit issued on September 27, 1984. Therefore, CCF must submit a modification request to reflect the changes in the new closure plan which was submitted January 13, 1992, from the closure plan in the Federal RCRA permit.

The differences between the Federal RCRA permit and the submitted closure plan are:

In Section 13.i, the final facility closure date is 2050. This date is the final closure date in the permit. This date must be modified to indicate the actual year of closure.

Section 13.iv (g) and (h), of the closure plan in the Federal RCRA permit contains specific off-site disposal and treatment facilities, and transporters. The specific facilities have been changed in the new Closure Plan.

CCF must submit a permit modification request to the United States Environmental Protection Agency in order to close the HWCSA pursuant to the permit. The request must contain the specific changes and the type of permit modification for each change. The permit modifications are listed in Title 40 Code of Federal Regulations (CFR) 42. However, some of these modifications may not be specifically listed, and therefore 40 CFR 270.42(d) should be applied.

In addition, in Table 3, the analytical method listed for the inorganic contaminants is SW-846 Test Method 1311. This is the Toxicity Characteristic Leaching Procedure (TCLP) analytical method. CCF also lists in Table 3, several organic constituents that also are come under the TCLP regulations, as

well as, being listed wastes. Therefore, the Land Disposal Regulation 40 CFR 268.9 is applicable, in addition to any analytical requirements the state regulations may require.

If you have any further questions you may call me at 312-886-7569.

Sincerely yours,

Stephen Bouchard

Enclosure

cc: Andrew Kubalak, OEPA-CO  
Ed Crepeau, OEPA-CO  
Ed Kitchen, OEPA-CO  
Brent E. Kinnan, Borden Inc.

CONCURRENCE REQUESTED FROM RPB			
OTHER STAFF	RPB STAFF	RPB SECTION CHIEF	RPB BRANCH CHIEF
<i>Kinn 5-7</i>	<i>mb 5-8-92</i>		

*Steve*

MAY 08 1992

HRP-8J

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
P.O. Box 208  
Columbus, Ohio 43201

RE: Closure Plan  
Columbus Coated Fabrics Facility  
Columbus, Ohio  
OHD 004 294 351

Dear Mr. Thomas:

Thank you for submitting a revised closure plan regarding the planned closure of the Hazardous Waste Container Storage Area (HWCSA) at the Columbus Coated Fabric (CCF) facility in Columbus, Ohio. The closure plan which was submitted and approved with modifications by the Ohio Environmental Protection Agency on April 17, 1992, contains minor variations from the closure plan that is contained within the Federal RCRA permit issued on September 27, 1984. Therefore, CCF must submit a modification request to reflect the changes in the new closure plan which was submitted January 13, 1992, from the closure plan in the Federal RCRA permit.

The differences between the Federal RCRA permit and the submitted closure plan are:

In Section 13.i, the final facility closure date is 2050. This date is the final closure date in the permit. This date must be modified to indicate the actual year of closure.

Section 13.iv (g) and (h), of the closure plan in the Federal RCRA permit contains specific off-site disposal and treatment facilities, and transporters. The specific facilities have been changed in the new Closure Plan.

CCF must submit a permit modification request to the United States Environmental Protection Agency in order to close the HWCSA pursuant to the permit. The request must contain the specific changes and the type of permit modification for each change. The permit modifications are listed in Title 40 Code of Federal Regulations (CFR) 42. However, some of these modifications may not be specifically listed, and therefore 40 CFR 270.42(d) should be applied.

In addition, in Table 3, the analytical method listed for the inorganic contaminants is SW-846 Test Method 1311. This is the Toxicity Characteristic Leaching Procedure (TCLP) analytical method. CCF also lists in Table 3, several organic constituents that also are come under the TCLP regulations, as



well as, being listed wastes. Therefore, the Land Disposal Regulation 40 CFR 268.9 is applicable, in addition to any analytical requirements the state regulations may require.

If you have any further questions you may call me at 312-886-7569.

Sincerely yours,

Stephen Bouchard

Enclosure

cc: Andrew Kubalak, OEPA-CO  
Ed Crepeau, OEPA-CO  
Ed Kitchen, OEPA-CO  
Brent E. Kinnan, Borden Inc.

BORDEN, INC.

180 EAST BROAD STREET • COLUMBUS, OHIO 43215-3799

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APR 29 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

LAW DEPARTMENT

BRENT E. KINNAN

GROUP COUNSEL

614-225-4447

FAX: 614-225-7133

April 27, 1992

RECEIVED DEC 22 1992  
WMD RCRA  
RECORD CENTER

Steve Bouchard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Borden, Inc. - Columbus Coated Fabrics  
Revised Closure Plan for Hazardous Waste  
Container Storage Area  
Ohio ID No. 01-25-0145  
EPA ID No. OHD 004 294 351

Dear Mr. Bouchard:

This is further to our telephone conversation today. The specific dates when our Columbus Coated Fabrics plant will be closed for summer vacation will be June 28 - July 12, 1992. We would like to schedule the work on the closure of the container storage area for that time period.

Anything you can do to expedite the review of our closure plan and help us achieve this scheduling will be appreciated.

Very truly yours,



Brent E. Kinnan

BEK/ds

cc: R. Springer  
G. Thomas



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

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APR 20 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

store

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

April 17, 1992

RE: CLOSURE PLAN  
Columbus Coated Fabrics  
OHD 004 292 351

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
P.O. Box 208  
Columbus, Ohio 43201

Dear Mr. Thomas:

On June 28, 1991, Columbus Coated Fabrics submitted to Ohio EPA a closure plan for a hazardous waste container storage area (S01) located at 1280 North Grant Avenue, Columbus, Ohio. A revision to the closure plan was received on January 14, 1992. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Columbus Coated Fabrics' proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Columbus Coated Fabrics in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of Columbus Coated Fabrics' submittal and subsequent revision, I conclude that the closure plan for the hazardous waste storage area at Columbus Coated Fabrics as modified herein, meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Columbus Coated Fabrics received on June 28, 1991 and revised on January 14, 1992 is hereby approved with the following modification:

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: C. H. Mackey Date 4/17/92

OHIO EPA

APR 17 92

ENTERED DIRECTOR'S JOURNAL



Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
Page Two

1. Disposal of nonhazardous wastewater into the sanitary sewer is permissible if Columbus Coated Fabrics complies with the Federal Clean Water Act and obtains written permission from the local POTW. Written permission from the local POTW shall be included in the certification report.

Please be advised that approval of this closure plan does not release Columbus Coated Fabrics from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.A. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: G. Mackey Date 4/17/92

OHIO E.P.A.

APR 17 92

ENTERED DIRECTOR'S JOURNAL

Mr. Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
Page Three

notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

  
Donald R. Schregardus  
Director

DRS/SL/pas

cc: Tom Crepeau, DHWM Central File, Ohio EPA  
Sandy Leibfritz, Ohio EPA, DHWM  
Lisa Pierard, USEPA - Region V  
Joel Morbito, USEPA - Region V  
Andrew D. Kubalak, CDO, DHWM  
Lundy Adelsburger, CDO, DHWM

OHIO E.P.A.

APR 17 92

ENTERED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

by: Chris Mackey Date 4/17/92



## COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



January 13, 1992

### FEDERAL EXPRESS

Mr. Thomas Crepeau, Section Mgr.  
Ohio EPA, Data Mgmt.  
1800 WaterMark Drive, Box 1049  
Columbus, OH 43266-0149

Ms. Lisa Pierard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn St.  
Chicago, IL 60604

Re: Borden, Inc. - Columbus Coated Fabrics  
Revised Closure Plan for the Hazardous Waste Container  
Storage Area (HWCSA)  
Ohio ID No. 01-25-0145  
EPA ID No. OHD 004 294 351

Dear Mr. Crepeau, & Ms. Pierard:

Columbus Coated Fabrics is herein submitting a modified closure plan for its hazardous waste container storage area that addresses items identified in the Notice of Deficiency issued by the OEPA on December 1, 1991. Columbus Coated Fabrics disagrees with OEPA's position that it is the December 2, 1981 Part A permit which should be the basis for this closure plan. Rather, the Part B permit approved by U.S. EPA, including the revised September 30, 1982 Part A application, is the appropriate basis for the closure plan. Nevertheless, CCF is acceding to OEPA's request that the closure plan incorporate references to the December 2, 1981 Part A permit.

If you have any questions or require additional information, please contact me at (614) 297-6097 or Todd Gates of T.M. Gates, Inc. (Consultant) at (513) 248-1025.

Sincerely,

Grover Thomas,  
Environmental Manager  
**COLUMBUS COATED FABRICS**

GT/rap  
attach.

cc: Andrew Kubalak, Ohio EPA, CDO  
Steve Rath, DSHWM Unit Supv., Ohio EPA-Central District Office  
Steve Bouchard, U.S. EPA  
Rick Spencer, T.M. Gates



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

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DEC 13 1991

*Steve*

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

George V. Voinovich  
Governor

CERTIFIED MAIL

NOTICE OF DEFICIENCY

Mr Grover Thomas  
Environmental Manager  
Columbus Coated Fabrics  
1280 North Grant Avenue  
P.O. Box 208  
Columbus, Ohio 43201

RE: CLOSURE PLAN  
Columbus Coated Fabrics  
OHD 004 294 351

Dear Mr. Thomas:

On June 28, 1991, Ohio EPA received from Columbus Coated Fabrics a closure plan for a hazardous waste container storage area (S01) located at 1280 North Grant Avenue, Columbus, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the Columbus Coated Fabrics' proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from July 15, 1991 through August 21, 1991. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

Mr. Thomas  
Columbus Coated Fabrics  
Page Two

The modified closure plan shall be in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.
2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Andrew D. Kubalak Ohio EPA, Central District Office, 2305 Westbrooke Drive, Building C, Columbus, Ohio 43228.

Upon review of the resubmitted plan, I will prepare and issue either a draft or a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Sandy Leibfritz, Ohio EPA, DHWM, Central Office (614) 644-2956 or Andrew D. Kubalak at (614) 771-7505.

Sincerely,

  
Donald R. Schregardus  
Director

DRS/SL/pas

cc: Tom Crepeau, DHWM, Central File, Ohio EPA  
Lisa Pierard, USEPA, Region V  
Joel Morbito, USEPA, Region V  
Andrew D. Kubalak, Ohio EPA, CDO  
Sandy Leibfritz, CO, Ohio EPA

## ATTACHMENT A

1. Section 1.2, Page 1, of the plan indicates that a revised Part A Permit application was submitted on September 30, 1982 and also indicates that the process design capacity is 24,750 gallons. Ohio EPA has no record that the September 30, 1982 Part A Permit Application was ever acted upon by the Hazardous Waste Facility Board. Therefore, the September 30, 1982 Part A Permit is not recognized as your current Part A Permit for Ohio.

The current Ohio EPA Part A Permit is dated December 2, 1981 (Attachment B). The closure plan shall address this Permit in order to satisfy Ohio EPA requirements. The current Part A Permit includes 24 hazardous waste codes and allows for the storage of up to 10,450 gallons of hazardous waste in containers.

As required by the Ohio Administrative Code 3745-66-12, Columbus Coated Fabrics shall revise the closure plan to reflect the current Ohio EPA, Part A Permit, dated December 2, 1981. Columbus Coated Fabrics shall revise the following closure plan sections and tables and any other sections, tables, etc. in the plan which refer to any EPA permits other than the December 2, 1981 Ohio EPA Part A Permit.

Section 1.2, Page 1 - Hazardous Waste Container Storage Area

Section 1.3, Page 3, Paragraph 2 - List of Hazardous Waste

Table 1, Page 5 - Permitted Hazardous Waste Identification

Table 3, Page 15 - Sample Analytical Parameters and Test Methods

Table 4, Page 17 - Closure Performance Standards

2. Table 1, Page 5 indicates that F002 and F003 hazardous waste codes for which the company is permitted, have never been generated or stored at the facility. This statement is contradicted by the 1990 annual report which includes the F002 and F003 hazardous waste codes. Columbus Coated Fabrics shall correct this text and include the hazardous constituents derived from the F002 and F003 waste in the sampling and analysis plan.

Attachment A  
Columbus Coated Fabrics  
Page Two

3. Figure 4, Page 9. The schedule for closure shall be revised to include when the independent engineer or his representative will be present to observe the critical points of closure.
4. Section 2.5.2, page 13. The closure plan shall specify that the debris and wash/rinse water contaminated (present above the analytical detection limit using test methods in SW-846) with non-naturally occurring constituents (i.e., organics) present in or derived from listed hazardous waste or exhibiting a characteristic of a hazardous waste shall be managed as a hazardous waste. Columbus Coated Fabrics shall specify how the debris and wash/rinse water will be disposed of if it is determined to be nonhazardous.
5. Section 2.9, Page 19, Status of Facility After Closure. This section of the plan indicates that Columbus Coated Fabrics will operate a less than ninety day storage area in Building No. 37.

Ohio EPA recommends that Columbus Coated Fabrics avoid using the hazardous waste container storage area for the accumulation of hazardous waste or hazardous material (s) until the closure certification is reviewed and accepted by Ohio EPA.



# hwfab

P.O. Box 1049  
361 E. Broad St.  
Columbus, Ohio 43216  
(614) 462-6981

hazardous • waste • facility • approval • board

James A. Rhodes, Governor  
Wayne S. Nichols, Chairman

Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

Re: Permit No. 01-25-0145

Attn: William G. Ilg

DEC 2 1981

Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

- 1) The standardized permit form (Findings and Conclusions and Issuance).
- 2) Terms and Conditions as approved by the Board (Special Terms and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).
- 3) Portions of the approved Part A permit application indicating the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. Any questions or comments concerning its content should be addressed to:

RECEIVED  
OHIO EPA

NOV 06 1991

DIV. OF HAZARDOUS WASTE & PCB

Ms. Peggy J. Vince  
Executive Director  
Hazardous Waste Facility Approval Board  
P.O. Box 1049  
361 East Broad Street  
Columbus, OH 43216  
Ph: (614) 462-6981

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

*Peggy J. Vince*

Peggy J. Vince  
Executive Director

PJV/ss

Enclosure

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL

STATE OF OHIO

HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:

Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

Permit No. 01-25-0145

Applicant/Permittee

The operator of the below-  
referenced hazardous waste  
facility

Columbus Coated Fabrics  
1280 North Grant Avenue  
Columbus, Ohio 43201

Facility

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL

Pursuant to Section 3734.05(D) of the Revised Code, The  
Hazardous Waste Facility Approval Board (Board) makes the  
following Findings and Conclusions and issues a Hazardous  
Waste Facility Installation and Operation Permit (Permit)

FINDINGS AND CONCLUSIONS

1. The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
3. All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
6. The Agency has recommended to the Board that a permit be issued to the facility.
7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
9. Pursuant to Resolution No. <sup>64</sup>-81, passed September 15, 1981, the Board found that the facility:
  - a. Was in operation immediately prior to October 9, 1980,
  - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
  - c. Submitted a completed permit application, and
  - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL

- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

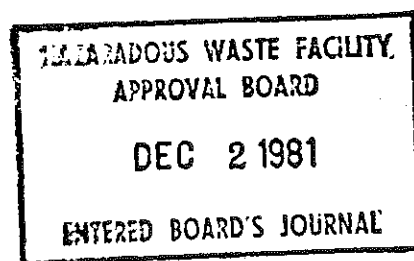
FOR THE BOARD, BY  
ORDER OF THE BOARD

Peggy J. Vinci

Dec. 2, 1981

Entered into the Journal of the Board on Dec 2, 1981 by

Madeline Samson/sec.





<b>FORM 1</b> <b>GENERAL</b>		<b>EPA</b> <b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>		<b>I. EPA I.D. NUMBER</b> <b>FOH D 0 0 4 2 9 4 3 5</b>	
<b>LABEL ITEMS</b> <b>I. EPA I.D. NUMBER</b> <b>III. FACILITY NAME</b> <b>V. FACILITY MAILING ADDRESS</b> <b>VI. FACILITY LOCATION</b>		<div style="text-align: center;"> <p>JUL 30 1981</p> <p>PLEASE PLACE LABEL IN THIS SPACE</p> </div>		<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided in the designated space. Review it carefully; if any of it is incorrect, through it and enter the correct data in the appropriate fill-in area below. Also, if the preprinted data is absent (the area left of the label space lists the data that should appear), please provide proper fill-in area(s) below. If the data is complete and correct, you need not fill in items I, III, V, and VI (except V must be completed regardless). Complete items if no label has been provided. See the instructions for detailed information and for the legal authorization which this data is collected.	

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any question, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your facility is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X" FORM ATTACHED			SPECIFIC QUESTIONS	MA	
	YES	NO	ATTACHED		YES	NO
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquaculture animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X

**III. NAME OF FACILITY**  
 1 **SKIP** COLUMBUS COATED FABRICS

**IV. FACILITY CONTACT**

<b>A. NAME &amp; TITLE (last, first, &amp; title)</b>		<b>B. PHONE (area code &amp; no.)</b>	
2	ILG WILLIAM G SENIOR PROJ ENG	614	225 6336

**V. FACILITY MAILING ADDRESS**

<b>A. STREET OR P.O. BOX</b>		<b>B. CITY OR TOWN</b>	<b>C. STATE</b>	<b>D. ZIP CODE</b>
3	PO BOX 208	COLUMBUS	OH	43216

**VI. FACILITY LOCATION**

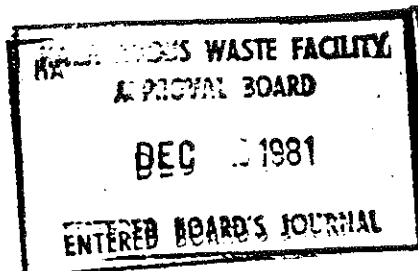
<b>A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER</b>		<b>B. COUNTY NAME</b>		<b>C. CITY OR TOWN</b>		<b>D. STATE</b>	<b>E. ZIP CODE</b>	<b>F. COUNTY CODE (if known)</b>
5	1280 NORTH GRANT AVENUE	FRANKLIN		COLUMBUS	OH	43201		

**APPROVAL BOARD**  
 DEC 2 1981  
 ENTERED BOARD'S JOURNAL

## III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

- Line #1 Solvent recovery is a two stage operation. In the first stage, solvent is removed from scrap ink. In the second stage, water introduced by the first operation is removed from the solvent.
- Line #2 Plating discharge treated to precipitate chrome and copper which is then removed in throw away filters.



## IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

## ENGLISH UNIT OF MEASURE

## CODE

POUNDS.....P  
TONS.....T

## METRIC UNIT OF MEASURE

## CODE

KILOGRAMS.....K  
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

## D. PROCESSES

## 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

WASTE NO. (enter code)	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	2	2	9	5	(specify)	7	(specify)
Coated Fabrics, Not Rubberized							
C. THIRD				D. FOURTH			
7	(specify)	7	(specify)				

## VIII. OPERATOR INFORMATION

A. NAME										B. Is the name from VIII-A owner?	
BORDEN INC										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)			
F = FEDERAL		M = PUBLIC (other than federal or state)		P = PRIVATE		O = OTHER (specify)		P		Private		614 225 40	

E. STREET OR P.O. BOX									
180 EAST BROAD STREET									

F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND	
COLUMBUS						OH		43215		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										MISC									
C. RCRA (Hazardous Wastes)										F. OTHER (specify)									
9 R										State Permits Attached									

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of Coated Fabrics

HAZARDOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

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## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
Robert W. Guthrie, President Borden Chemical		<i>Robert W. Guthrie</i>		11/11/80	

## COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-3 (6-80) 200 plastic solid storage tanks PAGE 1 OF 5 waste oil to protect CONTINUE ON REV  
50 gallon liquid storage  
50 CERO solid storage

NOTE: Photocopy this page before completion if you have more than 25 wastes to list.

Form Approved OMB No. 100-00000

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W 0 H D 0 0 4 2 9 4 3 5 1													W DUP												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
2. PROCESS DESCRIPTION (If a code is not entered in D(1))																									
1	F 0 0 1	halogenated solvents 850 drums	P	S 0 1																					
2	F 0 0 5	Non halogenated solvents 150 spent	T	<del>404</del> S 0 1																					
3	F 0 0 2	halogenated solvents spent																							
4	F 0 0 3	Non halogenated solvents spent																							
5	F 0 0 6	Wastewater treatment sludge 15	T	<del>404</del> S 0 1																					
6	F 0 0 9	Spent solvent, E. cor. water separator																							
7	P 0 0 1	Hydrovacuumation waste 500 solids	P	S 0 1																					
8	P 0 2 9	copper cyanides 200	P	S 0 1																					
9	P 0 3 0	cyanide solids																							
10	P 0 9 0	PCP 4042 100 (date on change)	P	S 0 1																					
11	P 0 9 8	Potassium cyanide 500	P	S 0 1																					
12	P 1 0 6	Radon cyanide 500	P	S 0 1																					
13	U 0 1 3	Mercury 1,000	P	S 0 1																					
14	U 1 5 1	Mercury 100	P	S 0 1																					
15	D 0 0 1	Oil 1,000	P	S 0 1																					
16	D 0 0 2	Oil 3.0	T	S 0 1																					
17	D 0 0 5	Oil 1.0	T	S 0 1																					
18	D 0 0 6																								
19	D 0 0 7	Oil 21.0	T	S 0 1																					
20	D 0 0 8	Oil																							
21	D 0 0 5	Form 105	T	S 0 1																					
22	D 0 0 6																								
23	D 0 0 7																								
24	D 0 0 8																								
25																									
26																									

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL



## V. FACILITY DRAWING (see page 4)

TO 4 PROCESS

IIC - LINE 2

TO 1 PROCESS

IIC - LINE 3

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 2 1981

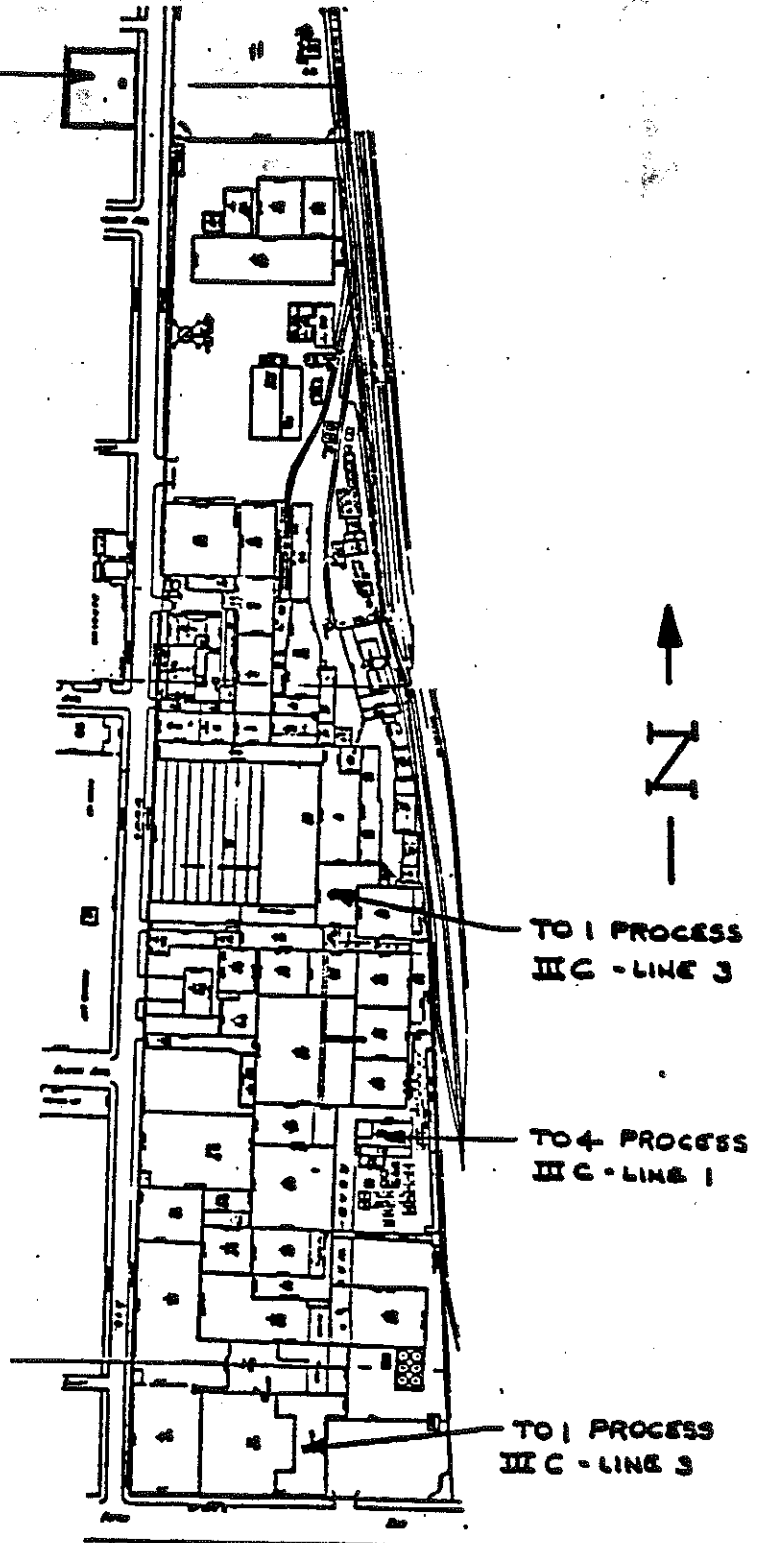
ENTERED BOARD'S JOURNAL

## NOTE:

SOI STORAGE

IIC - LINE 4

INSIDE STORAGE



APPROX. SCALE: 1" = 234'



ITEM X FORM I ADDENDA

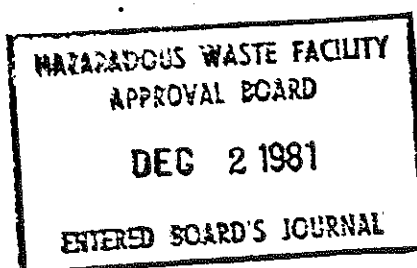
State Air Emission Permit Numbers:

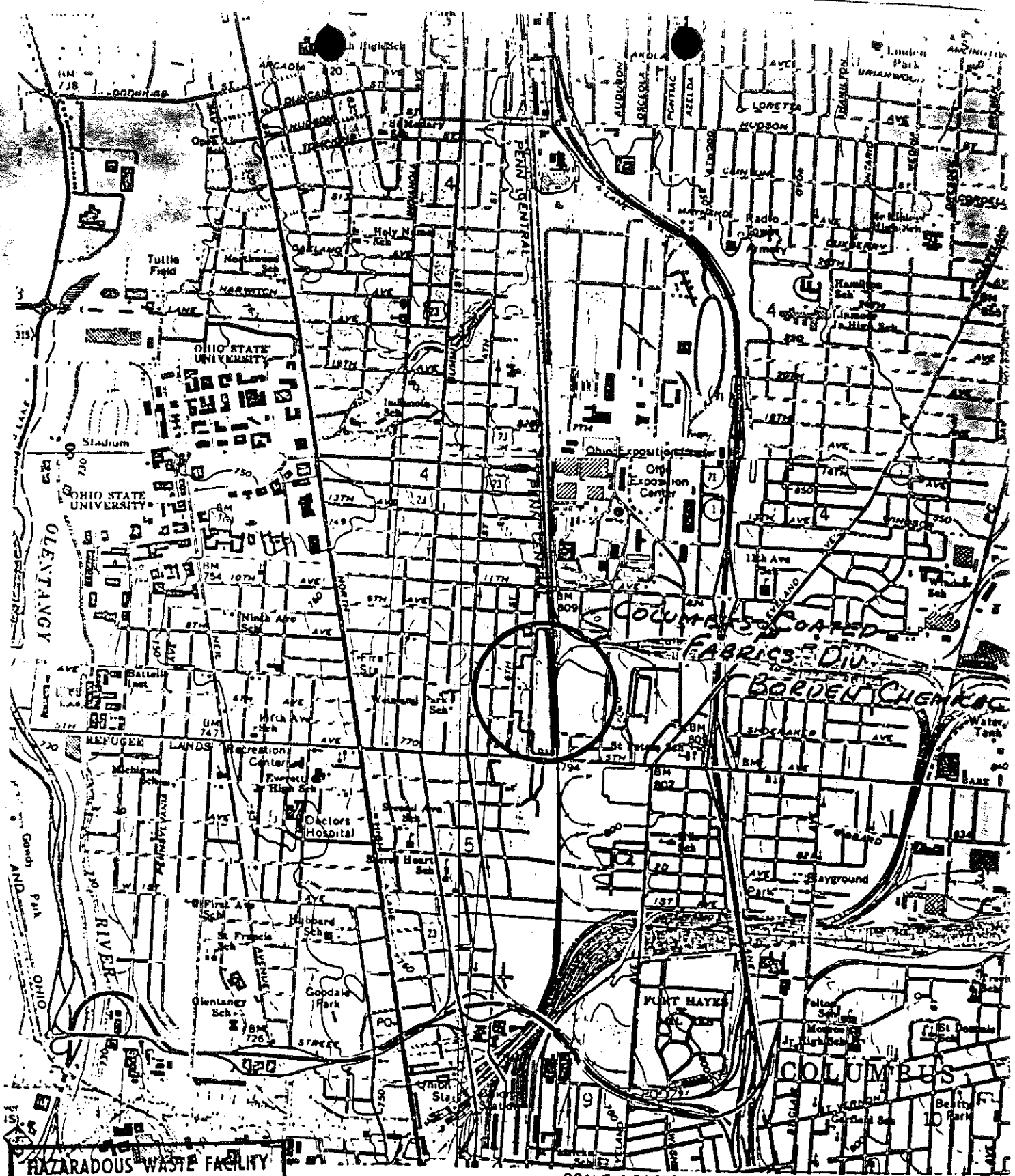
0125040031P001  
0125040031P002  
0125040031P003  
0125040031P004  
0125040031P005  
0125040031P007  
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0125040031P020  
0125040031P023  
0125040031P024  
0125040031P026  
0125040031P027  
0125040031P028  
0125040031P029  
0125040031P030  
0125040031P031  
0125040031P032  
0125040031P033  
0125040031P034  
0125040031P035  
0125040031P036

0125040031B003

Application Nos.:

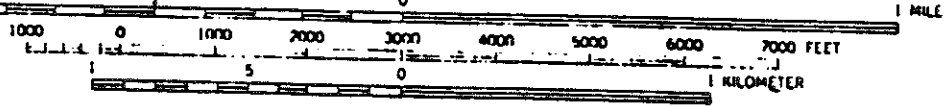
01-222  
01-223  
01-313





HAZARADOUS WASTE FACILITY  
APPROVAL BOARD  
DEC 2 1981  
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SCALE 1:24 000



CONTOUR INTERVAL 10 FEET  
DATUM IS MEAN SEA LEVEL

UTM GRID AND 1973 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET

## TERMS AND CONDITIONS (General)

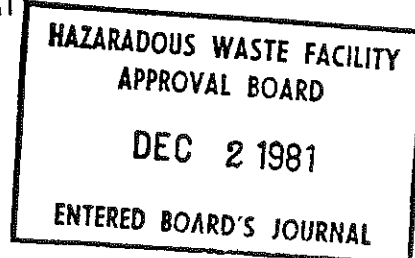
1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.
2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.
3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.
4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.
5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.
6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.
7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazardous Waste Facility Approval Board  
P.O. Box 1049  
361 East Broad Street  
Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

TERMS AND CONDITIONS (Special)

NOT APPLICABLE





Environmental and  
Applied Earth Science  
Consultants

**T. M. GATES, INC.**  
787 ROUND BOTTOM ROAD  
MILFORD, OHIO 45150  
513-248-1025

October 2, 1991

Mr. Steve Bouchard  
U.S.EPA, Region 5 5HR-13  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Borden, Inc.  
Columbus Coated Fabrics  
Revised Closure Plan for the Hazardous  
Waste Container Storage Area (HWCSA)

RECEIVED  
OCT 3 1991  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Mr. Bouchard:

Enclosed please find a duplicate copy of the report mentioned above dated June 27, 1991 that was submitted to the OEPA and U.S.EPA Region 5. We anticipate review comments within four (4) to six (6) weeks and would appreciate U.S.EPA comments concurrently.

If you have any questions regarding the above information, please feel free to contact me at (513) 248-1025.

Sincerely,

A handwritten signature in cursive script that reads "John V. Klingshirn".

John V. Klingshirn, P.E.  
Senior Engineer

JVK/ccc  
Enc.

cc: Mr. Grover Thomas (letter only)  
Mr. Gary Tong (letter only)



# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



June 27, 1991

## FEDERAL EXPRESS

Mr. Thomas Crepeau, Section Manager  
Ohio EPA, Data Management  
1800 Water Mark Drive  
P.O. Box 1049  
Columbus, OH 43266-0149

Ms. Lisa Pierard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn St.  
Chicago, IL 60604

Re: Columbus Coated Fabrics - Closure Plan  
Ohio ID No. 01-25-0145  
EPA ID No. OHD 004 294 351

Dear Mr. Crepeau & Ms. Pierard:

Columbus Coated Fabrics (CCF) was issued a final RCRA permit for hazardous waste container storage at its Columbus, Ohio facility by U.S. EPA on September 27, 1984. In lieu of resubmitting a revised Part B Permit Application to Ohio EPA, CCF notified Ohio EPA and U.S. EPA on May 23, 1991 that it intends to cease handling hazardous waste in a manner which requires a Hazardous Waste Facility Permit.

The closure plan in the Permit has been revised and two (2) copies are submitted herein as "Revised Closure Plan for the Hazardous Waste Container Storage Area (HWCSA)". This Revised Closure Plan has been prepared in accordance with applicable State and Federal regulations and the assistance of Ohio EPA's Closure Plan Review Guidance (May 1, 1991).

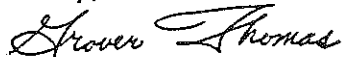
June 27, 1991

-2-

Columbus Coated Fabrics

If you have any questions or require additional information, please contact me at (614) 297-6097 or John Klingshirn, P.E. of T.M. Gates, Inc. (Consultant) at (513) 248-1025.

Sincerely,



Grover Thomas, Environmental Manager  
**COLUMBUS COATED FABRICS**

cc: Andrew Kubalak, Ohio EPA  
Steve Rath, DSHWM Unit Supervisor, Ohio EPA - Central District Office  
John Klingshirn, T. M. Gates

Mike Betts  
Martha Horvitz, Borden Law Dept.  
Wayne Judy  
George Rusincovitch  
Rick Springer, Borden Envir. Affairs  
John Sykes  
Gary Tong, Borden Envir. Affairs  
Jim Weaver



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED  
JUL 17 1991

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

George V. Voinovich  
Governor

July 12, 1991

Re: Columbus Coated Fabrics  
U.S. EPA ID No.: OHD004294351  
Ohio ID No.: 01-25-0145  
Closure Plan

Columbus Coated Fabrics  
Attn: Mr. Grover B. Thomas  
PO Box 208  
Columbus, Ohio 43216

Dear Mr. Thomas:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Columbus Coated Fabrics located at 1280 N. Grant Ave., Columbus, Ohio 43201 will appear the week of July 15, 1991 in the Columbus Dispatch, Columbus, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, August 21, 1991.

Copies of the plan will be available for public review at the Columbus Metropolitan Library, 96 S. Grant Ave., Columbus, Ohio 43215 and the Ohio EPA, Central District Office, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228.

Please contact Randy Sheldon at (614) 644-2977, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Solid and Hazardous Waste Management

TC/rs/closurereceipt

cc: Lisa Pierard, U.S. EPA, Region V  
Randy Meyer, Ohio EPA, DSHWM, RCRA TAS  
Andrew Kubalak, Ohio EPA, DSHWM, CDO

PUBLIC NOTICE

Franklin County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Columbus Coated Fabrics, 1280 N. Grant Ave., Columbus, Ohio 43201, EPA ID No.: OHD004294351, Ohio ID No.: 01-25-0145. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the Hazardous Waste Drum Storage Area for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Columbus Metropolitan Library, 96 S. Grant Ave., Columbus, Ohio 43215 and the Ohio EPA, Central District Office, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

F

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



June 27, 1991

**FEDERAL EXPRESS**

Mr. Thomas Crepeau, Section Manager  
Ohio EPA, Data Management  
1800 Water Mark Drive  
P.O. Box 1049  
Columbus, OH 43266-0149

Ms. Lisa Pierard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn St.  
Chicago, IL 60604

Re: Columbus Coated Fabrics - Closure Plan  
Ohio ID No. 01-25-0145  
EPA ID No. OHD 004 294 351

Dear Mr. Crepeau & Ms. Pierard:

Columbus Coated Fabrics (CCF) was issued a final RCRA permit for hazardous waste container storage at its Columbus, Ohio facility by U.S. EPA on September 27, 1984. In lieu of resubmitting a revised Part B Permit Application to Ohio EPA, CCF notified Ohio EPA and U.S. EPA on May 23, 1991 that it intends to cease handling hazardous waste in a manner which requires a Hazardous Waste Facility Permit.

The closure plan in the Permit has been revised and two (2) copies are submitted herein as "Revised Closure Plan for the Hazardous Waste Container Storage Area (HWCSA)". This Revised Closure Plan has been prepared in accordance with applicable State and Federal regulations and the assistance of Ohio EPA's Closure Plan Review Guidance (May 1, 1991).

June 27, 1991

-2-

Columbus Coated Fabrics

If you have any questions or require additional information, please contact me at (614) 297-6097 or John Klingshirn, P.E. of T.M. Gates, Inc. (Consultant) at (513) 248-1025.

Sincerely,



Grover Thomas, Environmental Manager  
COLUMBUS COATED FABRICS

cc: Andrew Kubalak, Ohio EPA  
Steve Rath, DSHWM Unit Supervisor, Ohio EPA - Central District Office  
John Klingshirn, T. M. Gates

Mike Betts  
Martha Horvitz, Borden Law Dept.  
Wayne Judy  
George Rusincovitch  
Rick Springer, Borden Envir. Affairs  
John Sykes  
Gary Tong, Borden Envir. Affairs  
Jim Weaver



## COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



May 23, 1991

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**



Mr. Thomas Crepeau  
Ohio EPA, DSHWM  
1800 WaterMark Dr.  
P.O. Box 1049  
Columbus, OH 43266-0149

Ms. Lisa Pierard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn St.  
Chicago, IL 60604

Re: Columbus Coated Fabrics  
Ohio ID No. 01-25-0145  
U.S. EPA ID No. OHD 004 294 351

Dear Mr. Crepeau and Ms. Pierard:

Columbus Coated Fabrics (CCF) was issued a final RCRA permit for hazardous waste container storage at its Columbus, Ohio facility by U.S. EPA on September 27, 1984. The permit application included a closure plan dated September 30, 1982 with revisions dated November 21, 1983.

CCF submitted a revised Part B Permit application to Ohio EPA and U.S. EPA on November 21, 1990. The Ohio EPA reviewed the revised application pursuant to the rules published in the Ohio Administrative Code - Hazardous Waste Facility Standards Chapters and the corresponding Federal Regulations. The Agency's completeness/technical adequacy review of the revised application was reported in a letter to CCF dated March 31, 1991.

In lieu of resubmitting the Part B Permit application, Columbus Coated Fabrics hereby provides notice that it intends to cease handling hazardous waste in a manner which requires a Hazardous Waste Facility Permit. In other words, CCF will close its hazardous waste container storage area and store its hazardous waste containers for less than ninety (90) days.

The Closure Plan included in the Permit application will be updated in order to comply with Ohio EPA's new closure plan review guidance issued May 1, 1991. As discussed by CCF's consultant, John Klingshirn of T.M. Gates, Inc., and Andy Kubalak of Ohio EPA, it would not be productive to submit a closure plan which does not conform to the new guidance. Because CCF did not receive a copy of the new guidance document until May 17, 1991, the revised Closure Plan could not be submitted by the date required in the March 31, 1991 letter from Ohio EPA.

May 23, 1991

-2-

Columbus Coated Fabrics

However, CCF will submit a revised Closure Plan for its hazardous waste container storage area by June 30, 1991.

If you have any questions or require additional information, please contact me at 614/297-6097 or John Klingshirn, P.E. of T.M. Gates, Inc. (consultant) at 513/248-1025.

Sincerely,



Grover Thomas, Environmental Manager  
**COLUMBUS COATED FABRICS**

GT/rap

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**REVISED CLOSURE PLAN FOR THE  
HAZARDOUS WASTE CONTAINER STORAGE AREA (HWCSA)**

**prepared for**

**COLUMBUS COATED FABRICS  
BORDEN PACKAGING AND INDUSTRIAL PRODUCTS  
DOMESTIC AND INTERNATIONAL  
DIVISION OF BORDEN, INC.  
1280 NORTH GRANT AVENUE  
COLUMBUS, OHIO 43201**

**(EPA ID NO. OHD 004 294 351)**

**JANUARY 13, 1992**



**Environmental and  
Applied Earth Science  
Consultants**

**T. M. GATES, INC.  
787 ROUND BOTTOM ROAD  
MILFORD, OHIO 45150  
(513) 248-1025**

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.

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January 13, 1992

OFFICE OF RCRA  
Waste Management  
U.S. EPA, REGION V

**FEDERAL EXPRESS**

*Harriet Oakes*

Mr. Thomas Crepeau, Section Mgr.  
Ohio EPA, Data Mgmt.  
1800 WaterMark Drive, Box 1049  
Columbus, OH 43266-0149

Ms. Lisa Pierard  
U.S. EPA, Region 5 5HR-13  
230 South Dearborn St.  
Chicago, IL 60604

Re: Borden, Inc. - Columbus Coated Fabrics  
Revised Closure Plan for the Hazardous Waste Container  
Storage Area (HWCSA)  
Ohio ID No. 01-25-0145  
EPA ID No. OHD 004 294 351

Dear Mr. Crepeau, & Ms. Pierard:

Columbus Coated Fabrics is herein submitting a modified closure plan for its hazardous waste container storage area that addresses items identified in the Notice of Deficiency issued by the OEPA on December 1, 1991. Columbus Coated Fabrics disagrees with OEPA's position that it is the December 2, 1981 Part A permit which should be the basis for this closure plan. Rather, the Part B permit approved by U.S. EPA, including the revised September 30, 1982 Part A application, is the appropriate basis for the closure plan. Nevertheless, CCF is acceding to OEPA's request that the closure plan incorporate references to the December 2, 1981 Part A permit.

If you have any questions or require additional information, please contact me at (614) 297-6097 or Todd Gates of T.M. Gates, Inc. (Consultant) at (513) 248-1025.

Sincerely,

*Grover Thomas*

Grover Thomas,  
Environmental Manager  
COLUMBUS COATED FABRICS

GT/rap  
attach.

cc: Andrew Kubalak, Ohio EPA, CDO  
Steve Rath, DSHWM Unit Supv., Ohio EPA-Central District Office  
Steve Bouchard, U.S. EPA ✓  
Rick Spencer, T.M. Gates

REVISED CLOSURE PLAN FOR THE  
HAZARDOUS WASTE CONTAINER STORAGE AREA (HWCSA)

prepared for

COLUMBUS COATED FABRICS  
BORDEN PACKAGING AND INDUSTRIAL PRODUCTS  
DOMESTIC AND INTERNATIONAL  
DIVISION OF BORDEN, INC.  
1280 NORTH GRANT AVENUE  
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(EPA ID NO. OHD 004 294 351)

prepared by

T. M. GATES, INC.  
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MILFORD, OHIO 45150

JANUARY 13, 1992



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## 1.0 FACILITY DESCRIPTION

### 1.1 General Description

The Columbus Coated Fabrics (CCF) facility is located at 1280 North Grant Avenue in Columbus, Ohio, north of downtown (Figure 1) and covers approximately five (5) acres. The facility manufactures decorative vinyl products. Hazardous wastes are generated from the manufacturing process and stored in containers temporarily pending shipment off-site for recycling/treatment/disposal.

The CCF facility has been developed on a long, relatively narrow property. More than one-hundred (100) buildings/rooms have been built during the 1920's through 1960's, primarily from the north end of the site progressing to the south end. The property is nearly covered with buildings, roadways and parking areas with little open area remaining. The facility plot plan is depicted on Figure 2.

The facility employs 466 full-time employees and operates a production department twenty-four (24) hours per day on three (3) shifts, five and one-half (5 1/2) days per week.

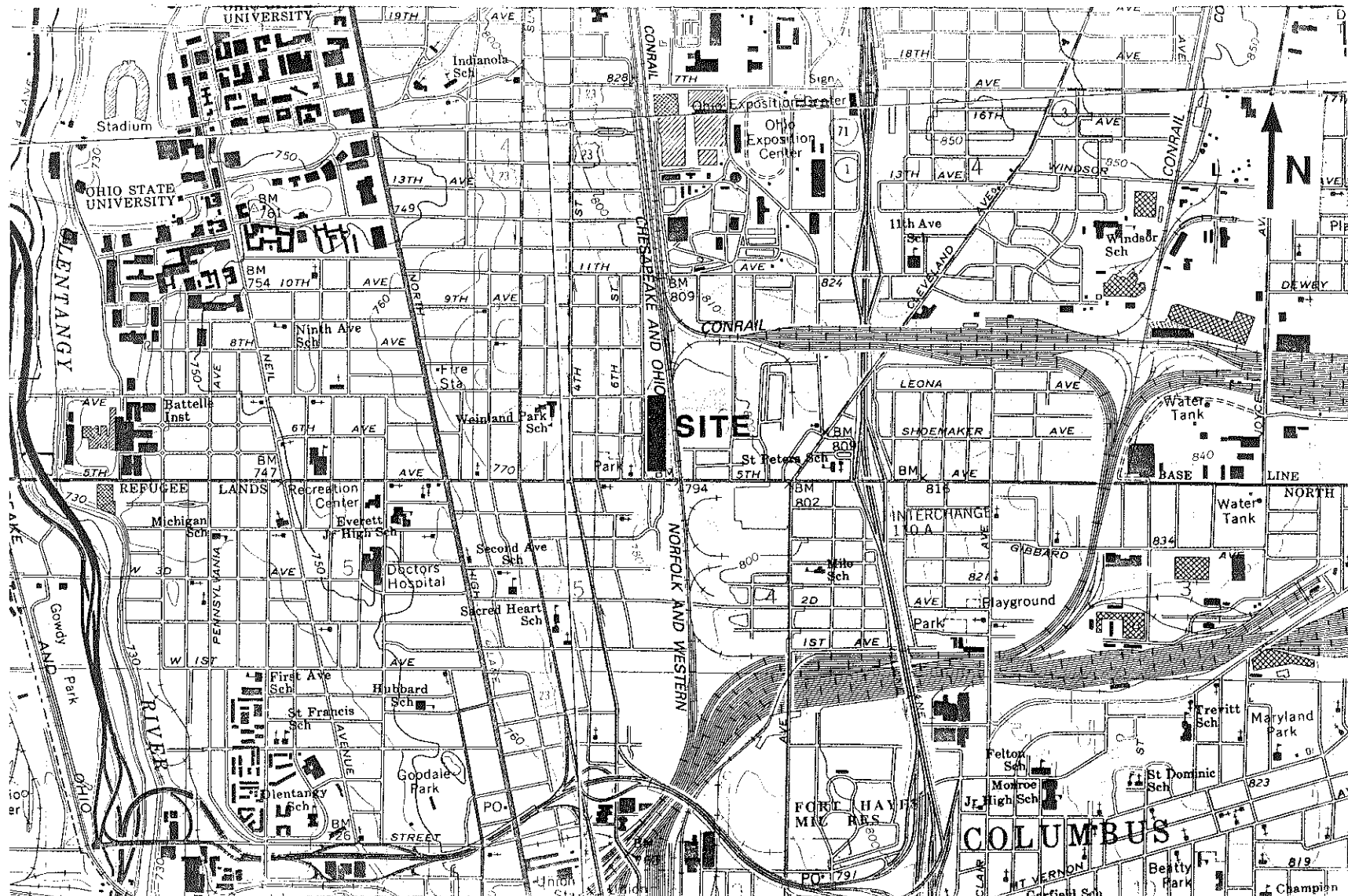
### 1.2 Hazardous Waste Container Storage Area

Columbus Coated Fabrics filed a ~~revised~~ Hazardous Waste Permit Application (Part A) on ~~September 30, 1982~~ **DECEMBER 2, 1981** which listed one (1) hazardous waste management unit, a hazardous waste container storage area (HWCSA), on line number ~~4~~ 4 of the application. This is the hazardous waste management unit which will be closed in accordance with the closure plan presented herein. The U.S.EPA issued a Hazardous Waste Management Permit (Part B) to CCF for the HWCSA on September 27, 1984. The process design capacity of the HWCSA is ~~24,750~~ **10,450** gallons (i.e., up to ~~450~~ **190** 55-gallon drums), **PURSUANT TO THE DECEMBER 2, 1981,**

# COLUMBUS COATED FABRICS - CLOSURE PLAN

## FIGURE 1

### SITE LOCATION



SCALE

1" = 2,000'

T.M. GATES, INC.

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**PART A PERMIT APPLICATION (AND 24,750 GALLONS OR UP TO 450 55 GALLON DRUMS PURSUANT TO THE SEPTEMBER 27, 1984, PART B PERMIT).**

The hazardous waste container storage area is located inside building No. 37 with access through building No. 59 at the southeastern portion of the facility as shown on Figure 2. The precise location of the HWCSA is latitude 39° 59' 23" and longitude 82° 59' 43". The HWCSA is inside a brick building which is approximately 32 feet wide, 50 feet long and 20 feet high. The building has a 6 inch thick, reinforced concrete floor, 4 inch high (minimum) concrete curbs and a composite steel deck roof. Construction details of the HWCSA are shown on Figure 3.

1.3 List of Hazardous Wastes

The Columbus Coated Fabrics facility is permitted to store the hazardous wastes listed on Table 1 in containers at the hazardous waste container storage area. The hazardous constituents for which the wastes are listed are also included on Table 1.

Hazardous wastes and constituents have been determined throughout the operating life of the HWCSA by waste analysis in accordance with the Part B Permit.

2.0 CLOSURE PROCEDURES

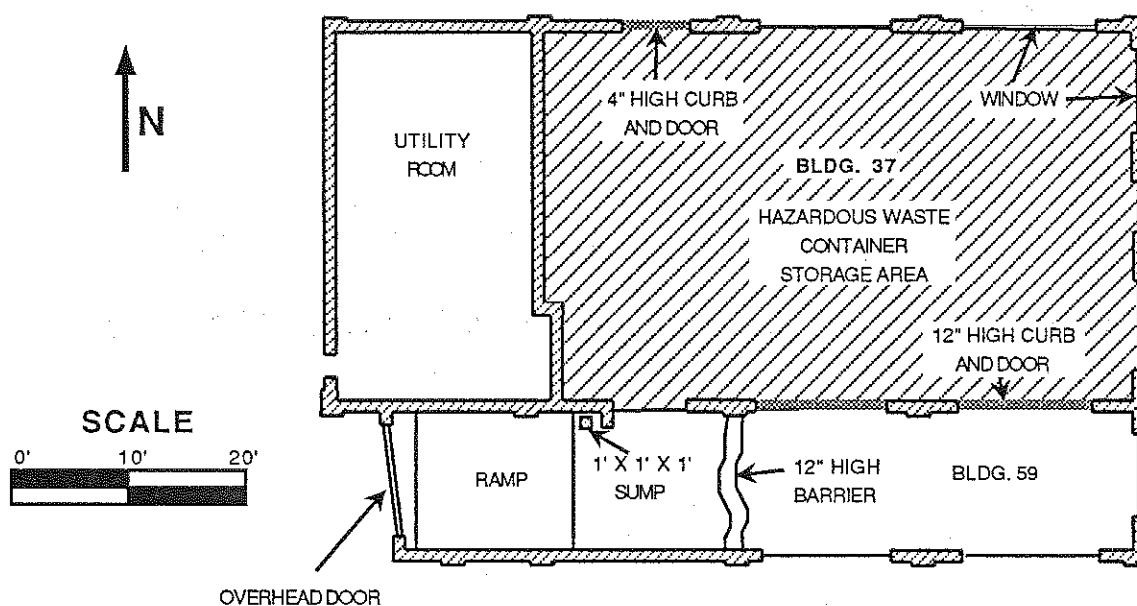
2.1 Removal of Waste Inventory

All hazardous wastes will be removed from the HWCSA at commencement of the field closure activities. Hazardous waste containers in the storage area are DOT 17E and 17H drums with 55-gallon capacity. Four (4) drums containing

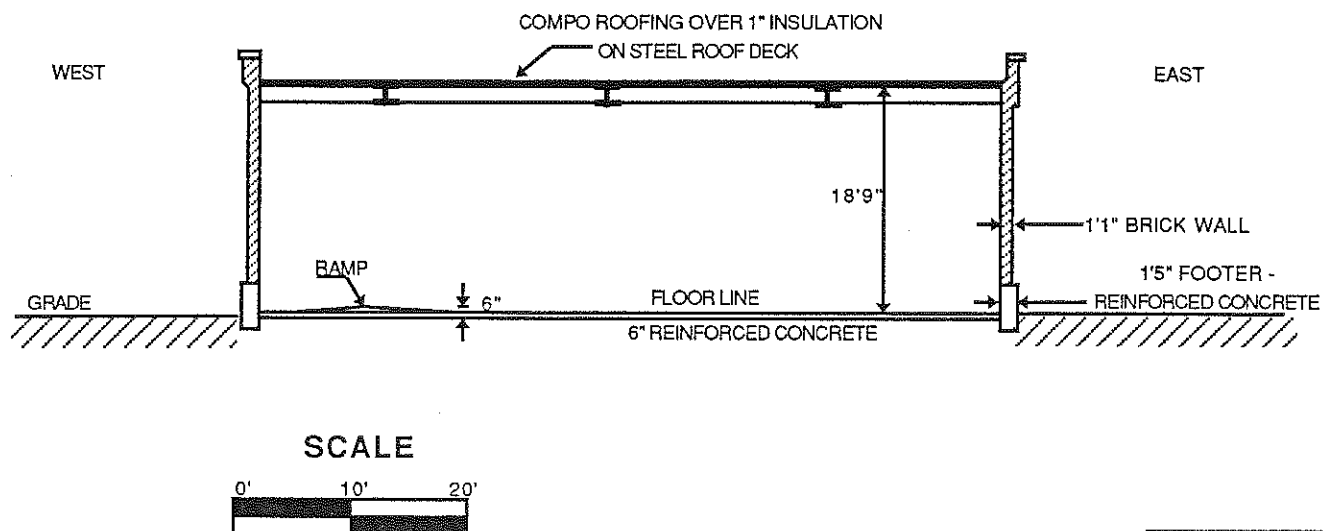


COLUMBUS COATED FABRICS - CLOSURE PLAN  
FIGURE 3  
HAZARDOUS WASTE CONTAINER STORAGE AREA  
CONSTRUCTION DETAILS

PLAN



ELEVATION



**COLUMBUS COATED FABRICS - CLOSURE PLAN**  
**TABLE 1**  
**PERMITTED HAZARDOUS WASTE IDENTIFICATION**

<u>U.S. EPA HAZARDOUS WASTE NUMBER</u>	<u>HAZARDOUS WASTE</u>	<u>HAZARDOUS CONSTITUENTS (BASIS FOR LISTING HAZARDOUS WASTE)</u>
D006	Cadmium (dust stop waste)	Cadmium
F002 (1)	Spent Halogenated Solvents	Methylene Chloride and 1,1,1-Trichloroethane
F003 (1)	Spent Non-halogenated Solvents	Cyclohexane
F005	Still bottoms from recovery of spent non-halogenated solvents	Methyl Ethyl Ketone
F006	Wastewater treatment sludge from electroplating operations	Hexavalent Chromium

Notes: (1) These wastes have never been generated or stored at the facility, although they are permitted.

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**COLUMBUS COATED FABRICS - CLOSURE PLAN**  
**TABLE 1**  
**PERMITTED HAZARDOUS WASTE IDENTIFICATION**

U.S. EPA HAZARDOUS WASTE NUMBER	HAZARDOUS WASTE	HAZARDOUS CONSTITUENTS (BASIS FOR LISTING HAZARDOUS WASTE)
F001	Spent Halogenated Solvents	Tetrachloroethene, 1,1,1-Trichloroethane, Methylene Chloride Trichloroethene, Carbon Tetrachloride, Chlorinated Fluorocarbons
F002	Spent Halogenated Solvents	Methylene Chloride, Trichloroethene, Chlorobenzene Orthodichlorobenzene, Tetrachloroethylene, 1,1,1-Trichloroethane, 1,1,2-Trichloro-1,2,2-Trifluoroethane, Trichlorofluoromethane
F003	Spent Non-halogenated Solvents	Acetone, Ethyl Acetate, Ethyl Benzene, Ethyl Ether, MIBK, N-Butyl Alcohol, Cyclohexanone, Methanol, Xylenes
F005	Still bottoms from recovery of spent non-halogenated solvents	Benzene, Carbon Disulfide, MEK, Isobutanol, 2-Ethoxy Ethanol, 2-Nitropropane, Pyridine, Toluene
F006	Wastewater treatment sludge from electroplating operations	Hexavalent Chromium
F009	Electroplating solutions with cyanide	Cyanide
P001 (1)	Warfarin	Warfarin
P029 (1)	Copper Cyanide	Copper Cyanide
P030 (1)	Cyanide Salts	Cyanide Salts
P090 (1)(2)	Cyanide	Cyanide
P098 (1)	Potassium Cyanide	Potassium Cyanide
P106 (1)	Sodium Cyanide	Sodium Cyanide
U013 (1)(2)*	Asbestos	Asbestos
U151 (1)	Mercury	Mercury
D001	Waste combustible liquids	Ignitable
D002	Waste acid from plating and engraving	pH
D005	Barium (Waste solids and liquids)	Barium
D006	Cadmium (dust stop waste)	Cadmium
D007	Chromium (waste from electroplating operations)	Chromium
D008	Lead (dust stop waste)	Lead

NOTES: (1) These wastes have never been stored on the drum storage pad although  
they are permitted under the December 2, 1981 Part A Permit  
(2) Not currently classified as a U.S.EPA Hazardous Waste Number  
\* Currently regulated under the Toxic Substances Control Act

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wastes are handled on each wooden pallet. Pallets of waste drums are carried by forklift out of the HWCSA at the southwest corner of the building, south on the plant roadway approximately one-hundred (100) feet to the warehouse/loading dock in building No. 85 (access by concrete ramp). Pallets of waste drums are loaded onto enclosed truck trailers at the south loading dock. The loading dock is approximately one-hundred (100) feet north of gate 5 which accesses Fifth Avenue, a main city thoroughfare. CCF forklifts will be operated by trained facility personnel. It is estimated that approximately one-hundred fifty (150) drums will be stored on the HWCSA at the time closure begins.

The hazardous wastes removed from the HWCSA will be transported off-site for recycling/treatment/disposal in accordance with RCRA regulations. Permitted hazardous waste transporters and recycling/treatment/disposal facilities which are used by CCF are listed on Table 2. All hazardous waste shipments will be accompanied by appropriate hazardous waste manifests and, if necessary, land-disposal notification/certification forms will be included. Columbus Coated Fabrics maintains hazardous waste transportation/disposal records for a period of five (5) years.

## 2.2 Closure Schedule

Columbus Coated Fabrics will remove or dispose of all inventoried hazardous waste from the HWCSA in accordance with the approved Closure Plan within ninety (90) days after the Director of Ohio EPA approves the Closure Plan. Final closure activities will be completed in accordance with the approved Closure Plan within one-hundred eighty (180) days after approval.

The closure schedule which includes all critical milestones is shown in Figure 4. Columbus Coated Fabrics or the independent registered Professional Engineer will notify the Ohio EPA

COLUMBUS COATED FABRICS - CLOSURE PLAN

TABLE 2

PERMITTED HAZARDOUS WASTE TREATMENT/DISPOSAL/TRANSPORTATION SERVICES

LIQUID FUELS BLENDING  
AND/OR RECYCLING

Avganic Industries  
114 N. Main St.  
Cottage Grove, WI 53527  
EPA ID#: WID 000 808 824

Safety-Kleen Corp.  
633 E. 138th St  
Dolton, IL 60410  
EPA ID#: ILD 980 613 913

Chemical Solvents, Inc.  
1010 Denison Ave.  
Cleveland, OH 44109  
EPA ID# OHD 980 897 656

Holnam, Inc./Safety-Kleen Corp.  
Rte. 2, Box 418, Highway 453 South  
Holly Hill, SC 29059  
EPA ID#: SCD 003 368 891

North East Chemical Corp.  
330 Monroe Ave.  
Cleveland, OH 44113  
EPA ID#: OHD 980 681 571

Systech Environmental Corp.  
County Road 176  
Paulding, OH 45879  
EPA ID#: OHD 005 048 947

Rhone-Poulenc Basic Chem. Co.  
2000 Michigan  
Hammond, IN 46320  
EPA ID#: IND 001 859 032

LIQUID & SOLIDS  
TREATMENT & DISPOSAL

CHEM-MET Services  
18550 Allen Rd.  
Wyandotte, MI 48192  
EPA ID#: MID 096 963 194

Petro-Chem Processing  
515 Lycaste  
Detroit, MI 48214  
EPA ID#: MID 980 615 298

Cyanokem  
1238 Schaefer Highway  
Detroit, MI 48227  
EPA ID#: MID 098 011 992

Rineco Chemical Industries  
1007 Vulcan Road-Haskell  
Benton, AR 72015  
EPA ID# ARD 069 748 192

LIQUID TREATMENT  
DISPOSAL & FUEL BLENDING

Research Oil  
2655 Transport Rd.  
Cleveland, OH 44115  
EPA ID#: OHD 004 178 612

Usher Oil Company  
9000 Roselawn Dr.  
Detroit, MI 48204  
EPA ID# MID 016 985 814

LIQUID TREATMENT &  
DISPOSAL

Tricil Environmental Services  
4350 Edgwin Dr.  
Hillard, OH 43028  
EPA ID# OHD 081 290 611

TABLE 2 (cont.)

TRANSPORATION

Chem Freight, Inc.  
6600 Bessemer Ave.  
Cleveland, OH 44127  
EPA ID#: OHD 986 966 190

Chemical Solvents Inc.  
3751 Jennings Rd.  
Cleveland, OH 44109  
EPA ID#: OHD 052 937 885

Cousins Waste Control  
1801 Matzinger Rd.  
Toledo, Ohio 43612  
EPA ID#: OHD 068 081 595

Mr. Frank, Inc.  
4747 Lincoln Mall Dr., Suite 603  
Matteson, IL 60443  
EPA ID#: ILD 984 775 049

Indianhead Truck Line, Inc.  
1947 W. County Rd. C  
Roseville, MN 55113  
EPA ID#: MND 006 963 318

Metropolitan Environmental Corp.  
310 W. Market  
Selina, OH 45822  
EPA ID# INT 190 010 397

P&F Trucking  
400 Marne Dr., N.E.  
Newark, OH 43055  
EPA ID#: OHD 980 613 368

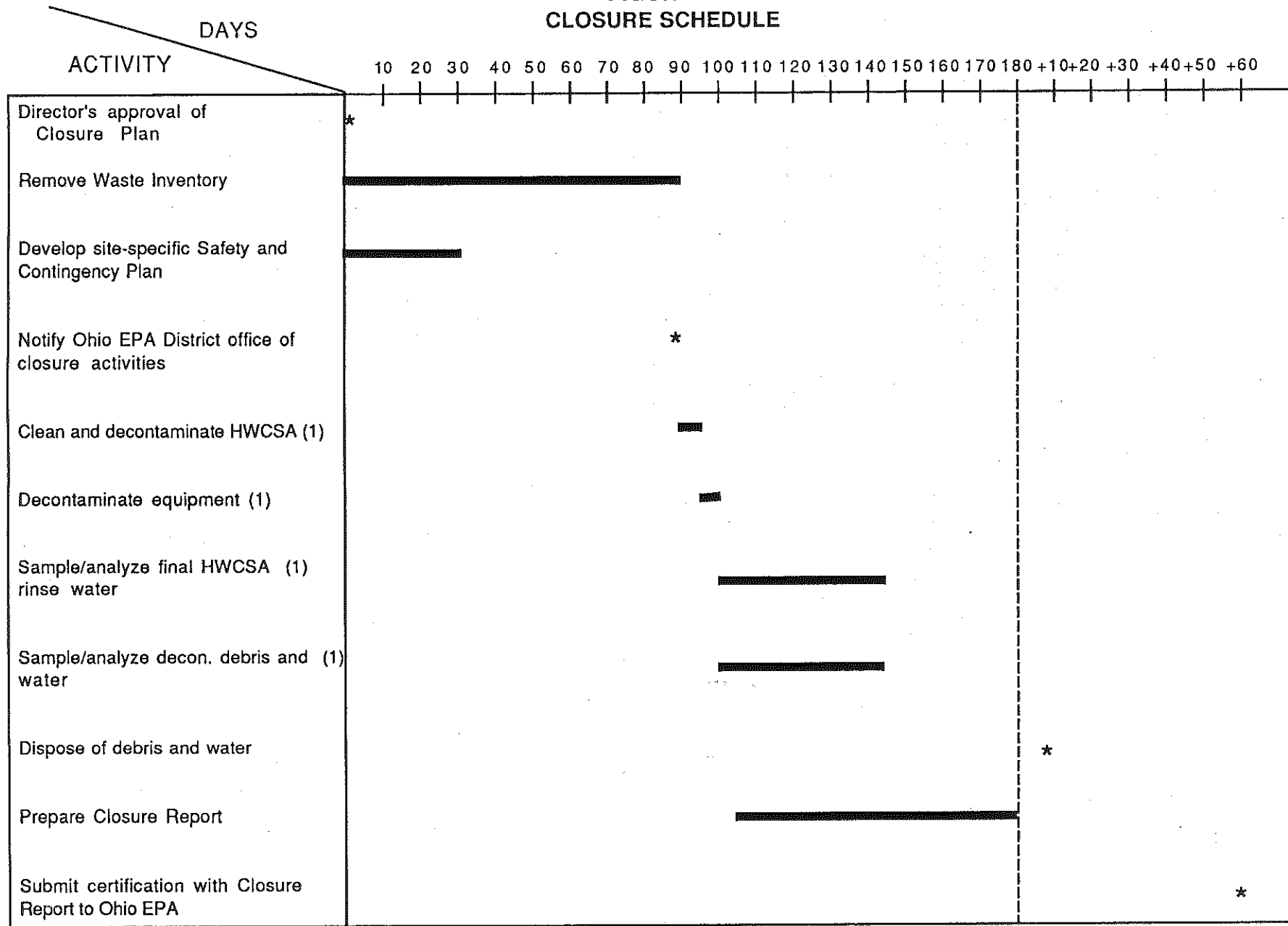
Schneider Tank Lines  
3061 S. Ridge Rd.  
Green Bay, WI 54306  
EPA ID#: WID 980 904 742

Tricil Environmental Services  
4350 Edgwin Dr.  
Hilliard, OH 43028  
EPA ID#: OHD 081 290 611



# COLUMBUS COATED FABRICS-CLOSURE PLAN

FIGURE 4  
CLOSURE SCHEDULE



NOTE: (1) Independent engineer or his representative will be present during these activities

COLUMBUS COATED FABRICS - CLOSURE PLAN

TABLE 2

PERMITTED HAZARDOUS WASTE TREATMENT/DISPOSAL/TRANSPORTATION SERVICES

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EPA ID#: ILD 980 613 913

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Holnam, Inc./Safety-Kleen Corp.  
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EPA ID#: SCD 003 368 891

North East Chemical Corp.  
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Petro-Chem Processing  
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Detroit, MI 48214  
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LIQUID TREATMENT &  
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Tricil Environmental Services  
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TABLE 2 (cont.)

TRANSPORATION

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Metropolitan Environmental Corp.  
310 W. Market  
Selina, OH 45822  
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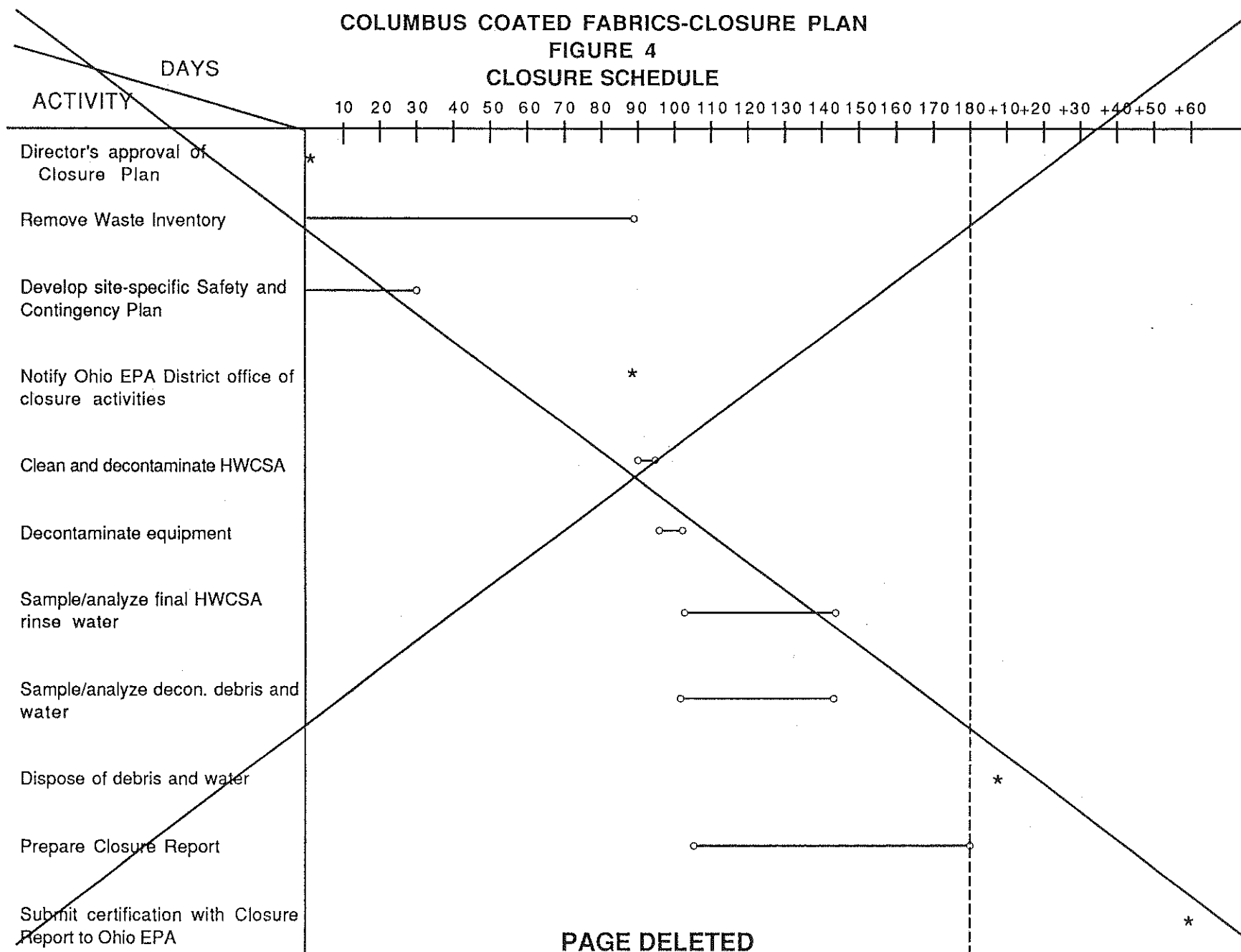
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1947 W. County Rd. C  
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EPA ID#: MND 006 963 318

# COLUMBUS COATED FABRICS-CLOSURE PLAN

FIGURE 4

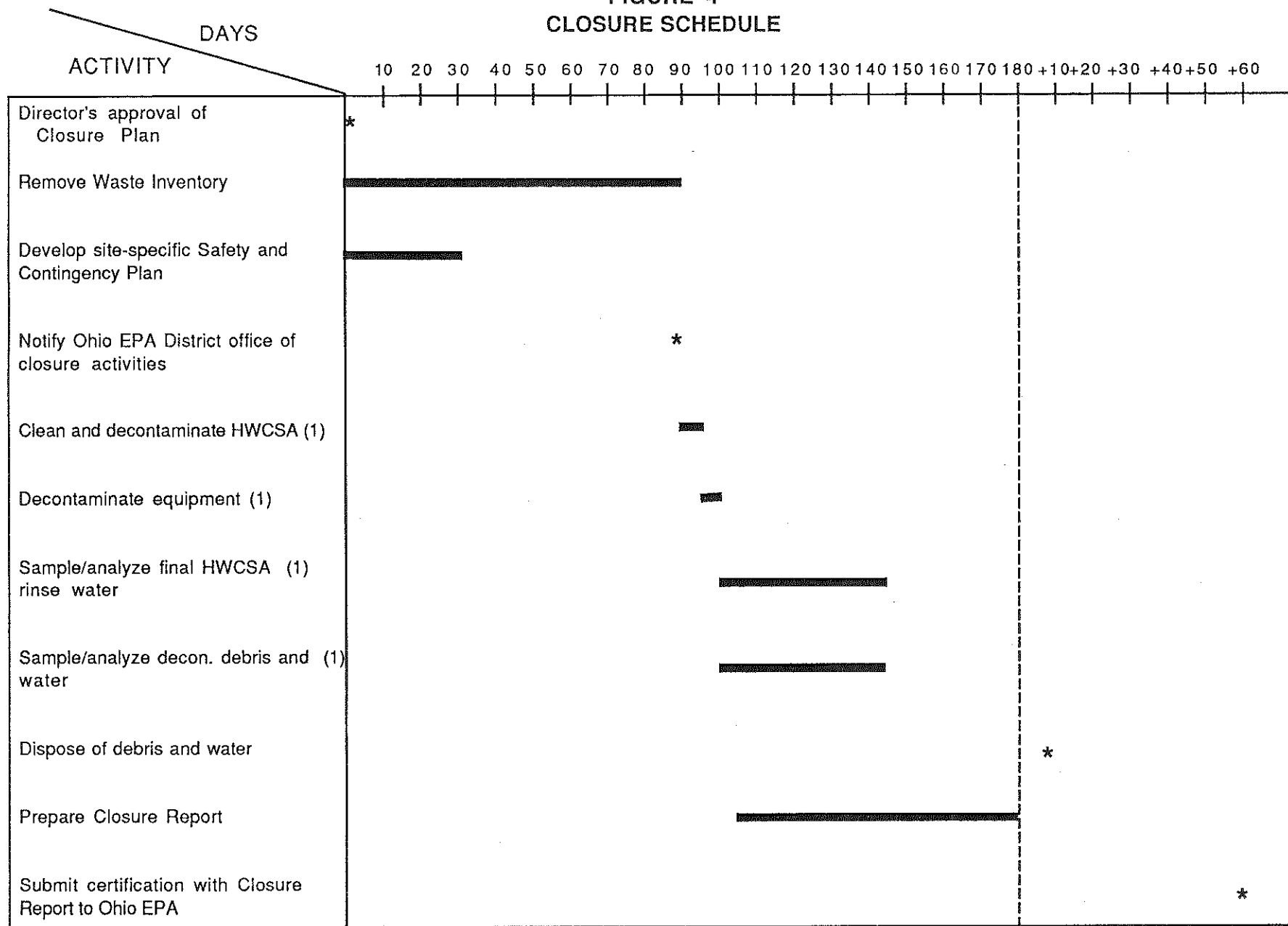
## CLOSURE SCHEDULE



# COLUMBUS COATED FABRICS-CLOSURE PLAN

FIGURE 4

## CLOSURE SCHEDULE



NOTE: (1) Independent engineer or his representative will be present during these activities

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Central District Office at least five (5) business days in advance of field sampling activities.

### 2.3 Air Emissions and Wastewater Discharge

Closure of the HWCSA will not generate potentially dangerous air emissions since all hazardous wastes are contained in closed drums. Wastewater generated by steam pressure washing and rinsing of the concrete pad will be contained on the pad and vacuumed promptly. Therefore, there will be no wastewater discharge. The HWCSA is located in an enclosed building and under roof, so there will be no contact with rainwater or surface water.

### 2.4 Safety and Fire Prevention

2.4.1 Contractor Site Safety and Contingency Plan - All T. M. Gates, Inc. (consultant/closure contractor to CCF) personnel comply with the requirements of 29 CFR 1910 regarding OSHA-regulated hazardous waste operations. These requirements include personnel training, medical surveillance, standard work practices, personal protective equipment, on-site monitoring, and personnel/equipment decontamination.

A copy of the T. M. Gates, Inc. Generic Site Safety and Contingency Plan (SSCP) is included as Appendix A of this submission. The Generic SSCP will be finalized after approval of the Closure Plan for implementation during field closure activities. All contractor personnel will be familiar with the SSCP and sign their acceptance of it.

2.4.2 Facility Safety Plans/Procedures - In addition to the contractor's SSCP for specific closure activities, Columbus Coated Fabrics has implemented extensive plans/programs in accordance with their Part B Permit for hazardous waste

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storage. These safety plans and procedures include:

#### Security Requirements

- 24-hour security by trained guards
- facility access control and remote camera monitoring
- visitor's pass and sign in/out requirements
- perimeter fence, gates and signs

#### Daily Inspection

- safety/emergency equipment
- security devices
- container storage area
- loading dock area

#### Spill Prevention Control and Countermeasures Plan

- chemical product/waste inventory
- spill prevention procedures and equipment
- emergency response procedures and equipment
- discharge contingency plan
- notification/emergency procedures and personnel
- facility evacuation plans
- incident follow-up reporting
- coordination with local emergency officials
- emergency coordinator and operation alert

#### Personnel Training

- RCRA and OSHA
- emergency action (fire brigade)
- employee training manuals
- list of trained personnel



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2.4.3 Safety, Emergency and Rescue Equipment - During closure of the HWCSA, Columbus Coated Fabrics will post a fire watch (trained member of fire brigade) to monitor safety conditions and practices. Safety equipment to be used or available during closure activities includes:

Personal Protective Equipment (PPE)

- Tyvek coveralls, safety boots, rubber outer boots
- safety glasses/shields
- hard hat
- nitrile gloves
- access to full face respirator with dust/mist filters and organic vapor cartridges

It should be noted that the closure schedule and cost estimate include thirty (30) minutes per person per shift for decontamination of their PPE. Disposable coveralls, boots, gloves, etc. will be discarded after use in drums for hazardous waste treatment/disposal as debris, if appropriate.

The CCF facility maintains a full compliment of emergency, safety and rescue equipment which is immediately available for use by trained personnel in case of an emergency. The equipment listed below is maintained at its regular location and will, therefore, not require decontamination unless it is deployed:

Facility Safety Equipment

- ABC rated fire extinguishers
- portable pumps
- fire-fighting hoses
- sprinkler system
- emergency shower
- non-sparking tools, shovels, etc.
- first-aid equipment

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Delineation of the exclusion, contamination reduction and support zones is detailed in the contractor's SSCP. Specific personnel decontamination procedures are also prescribed in the SSCP.

## 2.5 HWCSA Cleaning and Decontamination

After all drums and pallets have been removed from the HWCSA, safety personnel will check for organic vapors prior to entry. Since a kerosene-fired steam pressure washer will be used, the CCF fire watch will be posted during all "hot work". The floor and lower walls will be swept and hand scraped to remove dust and debris. All solid material will be contained in open-head drums for subsequent analysis/disposition. The concrete floor of the HWCSA will be steam pressure detergent washed and triple rinsed. The steam pressure washer generates one (1) gallon per minute steam at five-hundred (500) pounds per square inch pressure. During operation of the steam pressure washer, washwater/rinse water will be contained and directed with a squeegee and vacuumed with an industrial wet vacuum. The concrete dike wall surrounding the HWCSA will offer additional containment of wash and rinse water. Periodically, the contents of the wet vac canister will be emptied into drums for subsequent analysis/disposition.

A grab sample of the final rinse water will be collected for subsequent analysis to document thorough decontamination.

2.5.1 Equipment List - Equipment to be used during cleaning/decontamination of the HWCSA is listed below:

- OVA, PID or oxygen/explosimeter
- steam pressure washer
- industrial wet vacuum
- broom, shovel, scraper and squeegee
- water supply hose

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- electric extension cord
- open-head, 3-ring, DOT approved hazardous waste drums to contain solids and liquids

2.5.2 Equipment Decontamination - Equipment which may have come in contact with hazardous wastes will be decontaminated by scraping debris from exposed surfaces, steam pressure washing and triple rinsing. Collected debris and wash/rinse water will be contained in drums for subsequent analysis/disposition.

All contained debris and water will be managed as hazardous waste pending laboratory analytical results. **THE DEBRIS AND WASH/RINSE WATER CONTAMINATED (PRESENT ABOVE THE ANALYTICAL DETECTION LIMIT USING TEST METHODS IN SW-846) WITH NON-NATURALLY OCCURRING CONSTITUENTS (I.E., ORGANICS) PRESENT IN OR DERIVED FROM LISTED HAZARDOUS WASTE OR EXHIBITING A CHARACTERISTIC OF A HAZARDOUS WASTE SHALL BE MANAGED AS A HAZARDOUS WASTE.** Final disposition will be determined based upon analytical results. **ALL DEBRIS AND WASTEWATER THAT IS DETERMINED TO BE NONHAZARDOUS (BASED UPON LABORATORY ANALYTICAL RESULTS) WILL BE INCORPORATED INTO THE EXISTING FACILITY SANITARY WASTE STREAMS.** It is estimated that approximately three-hundred (300) gallons (i.e., 6 55-gallon drums) of debris and water will be collected from all cleaning and decontamination procedures. Decontamination of all equipment will be accomplished near the exit of the HWCSA within the curb, under roof. Decontamination wash and rinse water will be contained and vacuumed. In this manner, potentially contaminated equipment/personnel will not leave the contained HWCSA until thoroughly decontaminated.



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## 2.6 Sampling and Analytical Procedures

A water sample (sub-samples) will be collected from the final pad rinse (grab sample) for laboratory chemical analysis in order to document thorough decontamination of the HWCSA. Samples will also be collected from drums of solid debris, washwater and decontamination rinse water for laboratory chemical analysis in order to determine their appropriate disposition. In the meantime, all drums will be managed as hazardous waste. All samples will be grab samples.

All samples will be analyzed for the hazardous constituents of wastes generated by the facility and stored at the HWCSA. The constituents for analysis and laboratory analytical methods are prescribed in Table 3.

All grab samples will be collected with equipment constructed of stainless steel, glass or teflon in accordance with sampling methods prescribed in U.S.EPA SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition" and "Characterization of Hazardous Waste Sites - A Methods Manual: Volume II, Available Methods, Second Edition".

Laboratory analytical procedures, as prescribed in Table 3 are in accordance with U.S.EPA SW-846. The quality assurance/quality control (QA/QC) protocols for sample container preparation, shipping/handling under chain-of-custody and laboratory chemical analysis will be in accordance with written QA/QC plans for sample collection and laboratory chemical analysis. The laboratory's QA/QC plan has received certification, accreditation, approval or a successful audit from U.S.EPA Region V as well as numerous State and Federal environmental regulatory agencies. Their QA/QC plan includes all of the elements prescribed by SW-846.

Since the HWCSA is an engineered structure with a six (6) inch thick reinforced concrete floor, four (4) inch minimum height concrete curbs and is inside a building under roof, the

COLUMBUS COATED FABRICS - CLOSURE PLAN  
TABLE 3  
SAMPLE ANALYTICAL PARAMETERS AND TEST METHODS

<u>ANALYTICAL PARAMETERS</u>	<u>EPA SW-846 Test Method</u>	
	<u>Solid Sample</u>	<u>Liquid Sample</u>
Barium	1311 (non-volatile)	6010
Cadmium	1311 (non-volatile)	6010
Chromium	1311 (non-volatile)	6010
Hexavalent Chromium	basic (alkaline) digestion procedure	7196
Lead	1311 (non-volatile)	7421
Selenium	1311 (non-volatile)	7740
Ethyl Acetate	5030	8240
Methyl Ethyl Ketone	5030	8240
Methyl Isobutyl Ketone	5030	8240
Tetrahydrofuran (butylene oxide)	5030	8240
Xylene	5030	8240
Hydrochloric Acid (pH)	9045	9040
Cyanide (Total CN)	9010	9010
Ferric Chloride (Iron)	3050	6010
Zinc Chloride (Zinc)	3050	6010

Note: Method 5030 (purge and trap) by methanolic extraction for solid samples

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COLUMBUS COATED FABRICS - CLOSURE PLAN  
TABLE 3  
SAMPLE ANALYTICAL PARAMETERS AND TEST METHODS

ANALYTICAL PARAMETERS	EPA SW-846 Test Methods			
	Solid Sample	PQL (mg/kg)	Liquid Sample	PQL (mg/l)
Acetone	8240/5030	12.5	8240/5030	0.1
Benzene	8240/5030	0.625	8240/5030	0.005
Carbon Disulfide	8240/5030	0.625	8240/5030	0.005
Carbon Tetrachloride	8240/5030	0.625	8240/5030	0.005
Chlorobenzene	8240/5030	0.625	8240/5030	0.005
Cyclohexanone	8240/5030	6.25	8240/5030	0.005
Ethylbenzene	8240/5030	0.625	8240/5030	0.005
Ethyl Acetate	8240/5030	6.25	8240/5030	0.05
Ethyl Ether	8240/5030	6.25	8240/5030	0.05
2-Ethoxy Ethanol	8240/5030	125	8240/5030	1.0
N-Butyl Alcohol	8240/5030	125	8240/5030	1.0
Isobutanol	8240/5030	125	8240/5030	1.0
Methanol	8015	2.5	8015	1.0
MEK	8240/5030	12.5	8240/5030	0.1
MIBK	8240/5030	6.25	8240/5030	0.05
Methylene Chloride	8240/5030	0.625	8240/5030	0.005
Orthodichlorobenzene	8240/5030	0.625	8240/5030	0.005
Tetrachloroethene	8240/5030	0.625	8240/5030	0.005
Toluene	8240/5030	0.625	8240/5030	0.005
1,1,1-Trichloroethane	8240/5030	0.625	8240/5030	0.005
1,1,2-Trichloro-1,2,2-Trifluoroethane	8240/5030	0.625	8240/5030	0.01
Trichlorofluoromethane	8240/5030	0.625	8240/5030	0.005
Trichloroethene	8240/5030	0.625	8240/5030	0.005
2-Nitropropane	8240/5030	0.625	8240/5030	0.5
Pyridine	8270/3550	1.7	8270/3550	0.05
Xylenes	8240/5030	0.625	8240/5030	0.005
Warfarin	HPLC	not determined	HPLC	not determined

NOTES: Method 5030 (purge and trap) by methanolic extraction for solid samples  
Method 3550 ultrasonic extraction for solid samples  
HPLC = High Performance Liquid Chromatography

COLUMBUS COATED FABRICS - CLOSURE PLAN  
TABLE 3 (continued)  
 SAMPLE ANALYTICAL PARAMETERS AND TEST METHODS

ANALYTICAL PARAMETERS	EPA SW-846 Test Methods			
	Solid Sample	PQL (mg/kg)	Liquid Sample	PQL (mg/l)
Barium	1311 (non-volatile)	0.5	6010/3010	0.01
Cadmium	1311 (non-volatile)	0.5	6010/3010	0.005
Chromium	1311 (non-volatile)	0.5	6010/3010	0.01
Hexavalent Chromium	basic (alkaline) digestion procedure	2.0	7196/3060	0.01
Lead	1311 (non-volatile)	0.5	7421/3020	0.005
Mercury	1311 (non-volatile)	0.01	7470	0.0002
Hydrochloric Acid (pH)	9045	NA	9040	NA
Cyanide (Total CN)	1311 (non-volatile)	1.0	9010	0.01



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containment of any potential leaks or spills is excellent. In addition, there have been no reported leaks or spills in the HWCSA to challenge the excellent containment. Therefore, the closure of this HWCSA will be documented by analysis of the final pad rinse water and no further sampling is believed to be warranted.

## 2.7 Closure Performance Standards

2.7.1 HWCSA Final Rinse - The closure performance standards for "clean closure" of the HWCSA will be based upon analysis of the final rinse water sample, compared to the performance standards listed in Table 4. These performance standards are fifteen (15) times the maximum contaminant level (MCL) or maximum containment level goal (MCLG). Performance standards are set at one (1) milligram per liter (mg/l) if no MCL or MCLG is published, or if the function of fifteen (15) times the MCL or MCLG exceeds one (1) mg/l.

2.7.2 Contained Debris and Wash/Rinse Water - As previously mentioned, all debris and wash/rinse water which is contained during cleaning/decontamination of the HWCSA and equipment will be managed as hazardous waste pending laboratory chemical analysis. Final disposition of the debris and water will be determined by RCRA hazardous waste identification and listing regulations.

## 2.8 Closure Certification

Certification of closure will be submitted by both the owner and the qualified, independent Ohio registered Professional Engineer, in accordance with Ohio Administrative Code and Code of Federal Regulation signature requirements including exact wording of the certification statement. The closure report outline is suggested as follows:

COLUMBUS COATED FABRICS - CLOSURE PLAN

TABLE 4  
CLOSURE PERFORMANCE STANDARDS

<u>CONSTITUENT</u>	<u>MCL</u> <u>(mg/L)</u>	<u>MCLG</u> <u>(mg/L)</u>	<u>PERFORMANCE</u> <u>STANDARD</u> <u>(mg/L)</u>
Barium	2 (proposed)	2	1.0
Cadmium	0.01	--	0.15
Chromium	0.05	--	0.75
Hexavalent Chromium	--	--	1.0
Lead	0.05	--	0.75
Selenium	0.01	0.05 (proposed)	0.15
Ethyl Acetate	--	--	1.0
Methyl Ethyl Ketone	0.005 (proposed)	--	1.0
Methyl Isobutyl Ketone	--	--	1.0
Tetrahydrofuran (butylene oxide)	--	--	1.0
Xylene	10 (proposed)	10 (proposed)	1.0
Hydrochloric Acid (pH)	--	--	5-9 S.U.
Cyanide (Total CN)	0.2 (proposed)	0.2 (proposed)	1.0
Ferric Chloride (Iron)	--	--	1.0
Zinc Chloride (Zinc)	--	--	1.0

Note: proposed standards are scheduled to become effective in July, 1992

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COLUMBUS COATED FABRICS - CLOSURE PLAN

TABLE 4  
CLOSURE PERFORMANCE STANDARDS

CONSTITUENT	MCL (mg/L)	MCLG (mg/L)	PERFORMANCE STANDARD (mg/L)
Acetone	--	--	1.0
Benzene	0.005	0	0.075
Carbon Disulfide	--	--	1.0
Carbon Tetrachloride	0.005	0	0.075
Chlorobenzene	0.1(proposed)	0.1	1.0
Cyclohexanone	--	--	1.0
Ethylbenzene	0.7(proposed)	0.7	1.0
Ethyl Acetate	--	--	1.0
Ethyl Ether	--	--	1.0
2-Ethoxy Ethanol	--	--	1.0
N-Butyl Alcohol	--	--	1.0
Isobutanol	--	--	1.0
Methanol	--	--	1.0
MEK	0.005(proposed)	--	1.0
MIBK	--	--	1.0
Methylene Chloride	--	--	1.0
Orthodichlorobenzene	0.6(proposed)	0.6	1.0
Tetrachloroethene	0.005(proposed)	0	0.075
Toluene	1.0(proposed)	1	1.0
1,1,1-Trichloroethane	0.2	0.2	1.0
1,1,2-Trichloro-1,2,2-trifluoroethane	--	--	1.0
Trichlorofluoromethane	--	--	1.0
Trichloroethene	0.005	0	0.075
2-Nitropropane	--	--	1.0
Pyridine	--	--	1.0
Xylenes	10(proposed)	10(proposed)	1.0
Warfarin	--	--	1.0

Note: proposed standards are scheduled to become effective in July, 1992

**COLUMBUS COATED FABRICS - CLOSURE PLAN**  
**TABLE 4 (continued)**  
**CLOSURE PERFORMANCE STANDARDS**

CONSTITUENT	MCL (mg/L)	MCLG (mg/L)	PERFORMANCE STANDARD (mg/L)
Barium	2(proposed)	2	1.0
Cadmium	0.01	--	0.15
Chromium	0.05	--	0.75
Hexavalent Chromium	--	--	1.0
Lead	0.05	--	0.75
Mercury	0.002	0.002	0.03
Hydrochloric Acid (pH)	--	--	5-9 S.U.
Cyanide (Total CN)	0.2(proposed)	0.2(proposed)	1.0

Note: proposed standards are scheduled to become effective in July, 1992



January 13, 1992

1.0 Introduction

- 1.1 Description of Facility
- 1.2 Description of HWCSA
- 1.3 Reference to approved Closure Plan

2.0 Closure of HWCSA

- 2.1 Removal of Final Waste Inventory
- 2.2 Cleaning/Decontamination of HWCSA

3.0 Sample Collection and Analysis

- 3.1 Final Rinse Water Sample
- 3.2 Collected Debris and Wash/Rinse Water Sample

4.0 Final Disposition of Wastes Generated During Closure

5.0 Photographic Documentation

6.0 Closure Certification Statement and Signatures

APPENDICES      Manifests Documenting Disposal of Final  
Waste Inventory

Laboratory Analytical Reports and QA/QC  
Documentation

Documentation of Disposal for Wastes  
Generated During Closure

The Closure Report, including certification, will be submitted within sixty (60) days of completion of closure.

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## 2.9 Status of Facility After Closure

After THE certification of closure of the hazardous waste container storage area **HAS BEEN REVIEWED AND ACCEPTED BY OHIO EPA**, Columbus Coated Fabrics will operate a temporary storage area (i.e., less than 90 day storage) in building No. 37. In other words, CCF will operate only as a generator of hazardous wastes.

**DUE TO LOGISTICAL CONSIDERATIONS, THE PAD MAY CONTINUE TO BE USED AS A WASTE ACCUMULATION AREA DURING THE INTERIM PERIOD (I.E., THE PERIOD FOLLOWING PAD CLEANING AND PRIOR TO OEPA REVIEW AND ACCEPTANCE OF THE CERTIFICATION OF CLOSURE). DURING THIS INTERIM PERIOD, THE PAD WILL BE COVERED WITH AN IMPERMEABLE LINER TO PROTECT IT FROM INADVERTENT CONTAMINATION IN THE EVENT THAT RESAMPLING IS REQUIRED.**

Upon completion of closure, CCF will submit a written withdrawal request for their hazardous waste storage permit.

## 2.10 Closure Cost Estimate

A detailed written cost estimate for the activities described in this Closure Plan is included as Appendix B.

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APPENDIX A

GENERIC SITE SAFETY AND CONTINGENCY PLAN

**TYPE GENERIC SITE SAFETY AND CONTINGENCY PLAN  
(SSCP)**

**TITLE**

**SITE SAFETY AND CONTINGENCY PLAN**

**COMPANY**

**CITY, STATE**

**EPA ID#**

**T. M. GATES, INC.  
787 ROUND BOTTOM ROAD  
MILFORD, OHIO 45150**

**(DATE)**

## SITE SAFETY AND CONTINGENCY PLAN

SITE SAFETY AND CONTINGENCY PLANS PREPARED BY T. M. GATES, INC. ARE INTENDED SOLELY FOR USE BY T. M. GATES, INC. EMPLOYEES, AND ARE TO BE USED IN CONJUNCTION WITH T. M. GATES, INC. OCCUPATIONAL HEALTH AND SAFETY PROGRAMS AND POLICIES. EXCLUDING NEGLIGENCE, T. M. GATES, INC. ACCEPTS NO RESPONSIBILITY OR LIABILITY FOR NON-EMPLOYEES OF T. M. GATES, INC.

THE SITE SAFETY AND CONTINGENCY PLAN DESCRIBED HEREIN IS SUBJECT TO REVIEW AND REVISION BASED ON ACTUAL CONDITIONS ENCOUNTERED IN THE FIELD DURING SITE CHARACTERIZATION ACTIVITIES.

BEFORE SITE OPERATIONS BEGIN ALL EMPLOYEES INVOLVED IN THESE OPERATIONS WILL HAVE READ AND UNDERSTOOD THIS SITE SAFETY PLAN AND ALL REVISIONS.

THE FOLLOWING SITE PERSONNEL HAVE READ AND BEEN BRIEFED ON THE ENCLOSED SITE SAFETY AND CONTINGENCY PLAN.

Project Manager	_____	date	_____
Site Safety Officer	_____	date	_____
Project Geologist	_____	date	_____
Operating Engineer	_____	date	_____

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1.1 OBSERVED HAZARDS AND HAZARD INDICATIONS.....	
1.2 SUSPECTED CHEMICALS PRESENT.....	
1.3 AREA AFFECTED.....	
1.4 SITE GEOGRAPHY.....	
1.5 WEATHER CONDITIONS.....	
1.6 ENTRY OBJECTIVES.....	
1.7 EXPECTED PROJECT DURATION.....	
2.0 KEY PROJECT PERSONNEL.....	
3.0 SITE SAFETY AND HEALTH PLAN.....	
3.1 EMERGENCY MEDICAL CARE.....	
3.2 EMERGENCY PHONE NUMBERS.....	
4.0 SAFETY AND HEALTH RISK ANALYSIS VERSUS SITE ACTIVITY.....	
4.1 HAZARDOUS SUBSTANCE EVALUATION.....	
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## APPENDICES

### APPENDIX A - CHEMICAL HAZARD DESCRIPTIONS

### APPENDIX B - SITE SAFETY PROCEDURES

B.1 - COMMUNICATION PROCEDURES

B.2 - DECONTAMINATION PROCEDURES

B.3 - EMERGENCY PROCEDURES

B.4 - DRUM HANDLING PROCEDURES

## LIST OF FIGURES

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## LIST OF TABLES

TABLE 1 - SITE ACTIVITY VERSUS POTENTIAL  
HEALTH AND SAFETY HAZARDS.....

TABLE 2 - POTENTIAL HAZARDS AND PRECAUTIONS.....

TABLE 3 - CHEMICAL HAZARD DESCRIPTION.....

## 1.0 SITE DESCRIPTION

Date:

Site Name:

Location:

EPA ID#:

Size:                      area in acres

### 1.1 Observed Hazards and Hazard Indications

List can include visible vapor clouds, dead animals and/or vegetation, potentially explosive or flammable situations, confined space entry, holes or ditches, slippery surfaces, steep grades, uneven terrain, precariously positioned objects such as drums or boards that may fall, unstable surfaces such as walls or flooring that may give way, heat, cold, irritating plants, poisonous animals.

### 1.2 Suspected Chemicals Present

list chemicals present, which will be used in Table 3

### 1.3 Area Affected

acreage and description

### 1.4 Site Geography

Geography to include elevation of the land, slope, nearest surface water, and zoning.

The maximum elevation of the \_\_\_\_\_ facility is \_\_\_\_\_ ft.  
The ground surface slopes (slightly, moderately) to the \_\_\_\_\_.  
The surrounding population is  
(residential, commercial, industrial, agricultural) to

the \_\_\_\_ and \_\_\_\_\_ to the \_\_\_\_\_. The nearest surface water is \_\_\_\_ ft to the \_\_\_\_\_. Access to the side is via \_\_\_\_\_.

### 1.5 Weather Conditions

The site is located in a (continental, arid, tropical, etc.) zone with an average annual rainfall of \_\_\_\_ inches. Average winter temperature is \_\_\_\_ while average summer temperature is \_\_\_\_\_.

### 1.6 Entry Objectives

**Brief description of activities.**  
**Each activity will be used in Table 1.**

### 1.7 Expected Project Duration

\_\_\_\_\_ weeks.

## 2.0 KEY PROJECT PERSONNEL

**Use what is needed, delete what is not.**

Principal  
Project Manager  
Safety Officer  
Project Engineer  
Project Geologist  
Operating Engineer

Federal Agency Representatives  
name

phone number



## State Agency Representatives

name

phone number

## Owner Representatives

name

phone number

### 3.0 SITE SAFETY AND HEALTH PLAN

\_\_\_\_\_ **name** \_\_\_\_\_ is the site safety officer and is directly responsible to the Project Manager for safety recommendations on site.

#### 3.1 Emergency Medical Care

\_\_\_\_\_ **name(s)** \_\_\_\_\_ (**is, are**) the qualified EMT's on site. \_\_\_\_\_ **name** Hospital, phone # \_\_\_\_\_, is located \_\_\_\_\_ minutes from the site. The hospital is reached by **directions to emergency room** \_\_\_\_\_ (See Figure 1 for exact location). Dr. \_\_\_\_\_ was contacted on \_\_/\_\_/\_\_ and briefed on the situation, the potential hazards and the substances involved.

Local ambulance service is available from \_\_\_\_\_ at phone # \_\_\_\_\_.

First-aid equipment is available on-site at the following locations:

First-aid kit -	_____
Fire Extinguisher -	_____
Emergency Eye Wash -	_____
Emergency Shower -	_____

### 3.2 Emergency Phone Numbers

Hospital	_____
Ambulance	_____
Fire	_____
Police	_____
Airport	_____

See Figure 1 for the exact location of all emergency services.  
**Prepare Figure 1, street map with emergency locations highlighted.**

### 4.0 SAFETY AND HEALTH RISK ANALYSIS VERSUS SITE ACTIVITY

Table 1 plots the site activities to be performed against potential health and safety hazards anticipated. Table 2 lists activities and potential hazards with precautions to be implemented.

**Prepare Table 1 - Site Activity versus Potential Health and Safety Hazards (see example)**

**Prepare Table 2 - Potential Hazards and Precautions (see example)** After we have amassed enough creative Precautions we will automate Table 2 so you will only have to list Activity and Potential Hazards

Example activities include site characterization soil sampling, with a hand auger, tank testing, installing monitoring wells, soil excavation etc.

Example potential hazards include inhalation hazard, contact with contaminated soils, noise hazard, heat stress, electrical, potential fire/explosion, contact with contaminated liquids, cold stress, collapsing of structure on persons, physical injury, overhead power lines, buried tanks, underground pipes, skin hazard, ventilation problem, spillage of liquids, vandalism,

EXAMPLE

POTENTIAL HAZARDS AND PRECAUTIONS

TABLE 2

SAFETY AND HEALTH RISK ANALYSIS VERSUS SITE TASK/OPERATION

<u>ACTIVITY</u>	<u>POTENTIAL HAZARD</u>	<u>PRECAUTIONS</u>
Surface Soil Sampling	Contact with contaminated soil	<ul style="list-style-type: none"><li>• Do not kneel on ground</li><li>• Do not walk through discolored soils</li><li>• Follow decontamination procedures outlined in section [H]</li></ul>
	Heat Stress	<ul style="list-style-type: none"><li>• Increase liquid consumption to replace water lost during sweating</li><li>• Increase number of rest breaks</li><li>• Increase salt consumption in diet. DO NOT USE SALT TABLETS.</li></ul>
Surface Water (River)	Contact with contaminated water and sediment	<ul style="list-style-type: none"><li>• Use personal protective equipment noted in section [D]</li></ul>
	Drowning	<ul style="list-style-type: none"><li>• Use USCG approved life jackets</li></ul>

Installation  
of Monitoring  
Wells

Physical injury

- Exercise extreme caution when in vicinity of rotating equipment
- Minimize number of personnel in immediate vicinity of drilling equipment

Contact with contaminated soils and vapors

- Use all required personal protective equipment noted in section [D]
- Perform continuous air monitoring at the bore hole and at the breathing zone
- Upgrade level of personal protection according to established procedures
- Follow decontamination procedures outlined in section [H]

Heat Stress

- See reference above
-

equipment freezing problems, leaks in lines, etc.

#### 4.1 Hazardous Substance Evaluation

Table 3 presents a condensed health analysis of suspected chemicals present. Appendix 1 contains more detailed Chemical Hazard Descriptions.

Prepare Table 3 and Appendix 1, see example, of relevant hazardous substances.

The following chemicals have chart descriptions and Chemical Hazard Descriptions in the computer and only their name needs to be entered on the Blank (otherwise please develop the descriptions for your report and have them saved with the others).

Chlorodane  
T-1,2-Dichloroethene  
Ethyl Benzene  
Hexane  
Malathion  
Methyl Ethyl Ketone  
Mineral Spirits  
Naptha  
Parathion  
Tetrachloroethylene  
Toluene  
1,1,1-Trichloroethane  
Xylene

#### 5.0 ON-SITE CONTROL

\_\_\_\_name\_\_\_\_, site Project Manager for T. M. Gates, Inc., has been designated to coordinate access control and security on the site. A safe perimeter will be established \_ feet outward from the controlled area. No unauthorized persons will be

allowed within this area. The on-site command post and staging area will be established in the immediate area direction of the site activity area. The prevailing wind conditions are to the direction. This location is upwind from the contaminated area.

**EXAMPLE A - To be used when site activities require multiple zones of control.**

Figure 2 shows a sketch of the area labelling zones of control. Control boundaries will be established around the zones of control. The three levels of zones of concern are the Exclusion Zone, the Contamination Reduction Zone, and the Support Zone which are defined as follows:

- Exclusion Zone: Used in highly contaminated area being subjected to sampling, monitoring, and/or remediation. Usually the area in which active excavation and removal of contaminated material is occurring.
- Contamination Reduction Zone: ten (10) foot wide area surrounding the exclusion zone.
- Support Zone: all other areas.

Zone boundaries are identified by:

- Exclusion Zone-red boundary tape, traffic cones, fence.
- Contamination Reduction Zone-red tape, traffic cones, fence.
- Support Zone-no markings

This site utilizes \_\_\_\_\_ and \_\_\_\_\_ zones of concern at this time, as indicated in Figure 2.

**EXAMPLE B - To be used when zones of control are not necessary.**

Figure 2 is a facility site plan indicating where activities will be performed. During the majority of site activities, direct contact with hazardous chemicals is not anticipated. As a consequence, subdivision of the site into zones of concern (i.e., Exclusion Zone, Contamination Reduction Zone and Support Zone) is not necessary. The Project Manager is responsible for assigning levels of protection necessary for site activities and for implementation of zones of control if it is warranted by site conditions. If zones of control are implemented the SSCP will be revised at that time.

## 6.0 ENVIRONMENTAL MONITORING PROCEDURES

On site air quality monitoring will be conducted for L.E.L. of Volatile Organic Compounds.

1. Pre-Work Survey: An air survey will be taken on a daily basis at all contaminated zone designations prior to personnel access.
  - i. Perimeter Air Monitoring will consist of at least one test per side of the work or stockpile area. At least one test will be conducted directly downwind of the area being tested.
  - ii. Suspected hot-spots within each contaminated zone will be monitored.
2. Construction Air Monitoring:
  - i. Test meters will be available at all times during construction or excavation activities.
  - ii. Periodic air monitoring of the zone will be conducted at such times as:
    - During excavation should vapors be observed.
    - During excavation should liquids or wet soil



materials be encountered.

- Prior to any worker entering an excavation pit.
- Prior to any confined space entry.

3. Action Concentration Level: An exceedance of an action concentration level will require personnel in those areas to be removed or equipped with suitable respiratory protection equipment

- i. Lower Explosive Limit values in excess of 20% L.E.L.

The following environmental monitoring instruments shall be used on site at the specified intervals.

Combustible Gas indicator - - - - - Continuous, hourly  
daily, as needed

O2 Monitor - - - - - Continuous, hourly  
daily, as needed

HNU/OVA - - - - - Continuous, hourly  
daily, as needed

IR Spectrophometer - - - - - Continuous, hourly  
daily, as needed

UV Photoionization Detector - - - - - Continuous, hourly  
daily, as needed

Flame Ionization Detector - - - - - Continuous, hourly  
daily, as needed

Other \_\_\_\_\_ - - - - - Continuous, hourly  
daily, as needed

## 7.0 PERSONAL PROTECTIVE EQUIPMENT

### **EXAMPLE A - used with multiple zones of control.**

Based on an evaluation of potential hazards, the following levels of personal protection have been designated for the zones of concern in Figure 2 and the activities listed in Table 1.

<u>ZONES OF CONCERN</u>	<u>ACTIVITIES</u>	<u>LEVEL OF PROTECTION</u>
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### **EXAMPLE B - used when zones of control are not necessary.**

Based on an evaluation of the potential hazards, Level A Protection will be utilized across the site.

Specific protective equipment for each level of protection is as follows:

Level A: Fully-encapsulating chemical resistant suit Inner chemical-resistant gloves  
Chemical-resistant safety boots/shoes  
Pressure-demand full-facepiece SCBA,  
Pressure-demand supplied-air respirator with escape SCBA hard hat, Disposable coveralls, two-way radio

Level B: Pressure-demand, full facepiece SCBA  
Pressure-demand supplied-air respirator with escape SCBA  
Hooded, one or two piece chemical splash unit  
Disposable, chemical resistant coveralls  
Inner and outer chemical-resistant gloves  
Chemical-resistant safety boots/shoes  
Hard hat, face shield, two-way radio,

Level C: Full-facepiece, air-purifying, canister type respirator  
Hooded, one or two-piece chemical splash suit  
Disposable chemical-resistant coveralls  
Overalls and long-sleeved jacket  
Inner and outer chemical-resistant gloves  
Chemical-resistant safety boots/shoes  
Hard hat, two-way radio

Level D: The following equipment must be readily available but not necessarily worn at all times  
Half-face cartridge  
Coveralls  
Safety boots/shoes  
Hard hat Respiration Safety glasses, gloves

The following protective casing materials are necessary to provide protection from the chemicals present at the site:

<u>Substance</u>	<u>Material</u>
_____	_____
_____	_____
_____	_____

If air purifying respirators are authorized, NIOSH approved canisters or cartridges for organic vapors or \_\_\_\_\_ will be used as appropriate.

ENGINEERING CONTROLS WILL BE USED WHENEVER PRACTICABLE TO REDUCE HEALTH HAZARDS.

ALL EMPLOYEES USING PERSONAL PROTECTIVE EQUIPMENT WILL BE AWARE OF THE PROPER SELECTION, USE, AND MAINTENANCE OF SUCH EQUIPMENT.

NO CHANGES TO THE SPECIFIED LEVELS OF PROTECTION SHALL BE MADE WITHOUT THE APPROVAL OF THE SITE SAFETY OFFICER AND THE PROJECT MANAGER.

## 8.0 HEALTH SURVEILLANCE PROGRAM

All employees involved with this project work will participate in a health surveillance program under the direction of an Occupational Physician. This program will include a pre-project medical evaluation and a post-project follow-up examination (when required). The pre-project evaluation will consist of the following:

- Comprehensive Health and Exposure History
- Physical Evaluation
- Urinalysis
- SMAC 24 including total cholesterol and High Density Lipoproteins and GGTP
- Complete blood count (CBC), differential, hematocrit, and hemoglobin
- Chest X-ray
- Pulmonary Function Testing
- Audiometry
- Vision Testing (distant, near, color)

Additionally, each employee will be evaluated to determine if they are physically able to perform work while using respiratory protective equipment in compliance with 29 CFT Part 1910.134 and ANSI 288.2 - 1980.

## APPENDIX A

### CHEMICAL HAZARD DESCRIPTIONS

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## CHEMICAL HAZARD DESCRIPTIONS - EXAMPLE

### ETHYL BENZENE

#### SYNONYMS

Phenylethane; Ethylbenzol  
 $C_2H_5C_6H_5$

#### CODES

CAS 100-41-4  
NIOSH RTECS DA0700000  
DOT UN1175 Hazardous Material Emergency  
Response Guidebook No. 26

#### EXPOSURE LIMITS

OSHA PEL 8-hour time weighted average 100 ppm  
Immediately dangerous to life or health after  
30 minutes 2,000 ppm.

#### PHYSICAL DESCRIPTION/PROPERTIES

Colorless liquid with an aromatic odor.  
Solubility 0.015%. Flash point 59 F. Upper  
explosive limit 6.7% in air. Lower explosive limit  
1.0% in air.

#### PERSONAL PROTECTION AND SANITARY PROTECTION

Wear appropriate clothing to prevent repeated or prolonged skin contact. Wear eye protection to prevent reasonable probability of eye contact. Wash promptly when skin becomes contaminated. Remove immediately any clothing that becomes wet to avoid flammability hazard.

#### RESPIRATOR SELECTION

Any powered air-purifying respirator with organic vapor cartridges to 1,000 ppm.

#### HEALTH HAZARDS

Routes of entry include inhalation, ingestion, skin and/or eye contact. Symptoms of exposure include irritation of eyes and mucous membrane, headache, dermatitis, narcosis, coma. Target organs include eyes, upper respiratory system, skin, central nervous system.

## FIRST AID

EYE - immediately wash the eye with large amounts of water, occasionally lifting the lower and upper lids; get medical attention immediately; contact lenses should not be worn when working with ethyl benzene.

SKIN - flush the contaminated skin with water promptly; immediately remove non-impervious clothing; if irritation persists, get medical attention.

BREATH - if a person breathes in large amounts of ethyl benzene, move to fresh air at once; if breathing has stopped, perform artificial respiration; keep warm and at rest; get medical attention as soon as possible.

SWALLOW - get medical attention immediately.



EMERGENCY NUMBERS AND PERSONNEL

(POST NEAR PHONE)

**Company**

**Site Name**

**Applicable ID#**

EMERGENCY NUMBERS

Hospital -	<b>Name</b>	<b>Phone Number</b>
Ambulance - <b>Number</b>	<b>Name</b>	<b>Phone</b>
Fire - <b>Number</b>	<b>Name</b>	<b>Phone</b>
Police - <b>Number</b>	<b>Name</b>	<b>Phone</b>
Airport - <b>Number</b>	<b>Name</b>	<b>Phone</b>

FEDERAL AGENCY REPRESENTATIVES

<b>Name</b>	<b>Phone Number</b>
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STATE AGENCY REPRESENTATIVES

<b>Name</b>	<b>Phone Number</b>
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OWNER REPRESENTATIVES

<b>Name</b>	<b>Phone Number</b>
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## KEY PROJECT PERSONNEL

Principal

Project Manager

Safety Officer

Project Engineer

Project Geologist

Operating Engineer

## APPENDIX B

### SITE SAFETY PROCEDURES

### B.1 COMMUNICATION PROCEDURES

A horn blast is the emergency signal to indicate that all personnel should evacuate the Exclusion Zone.

The following standard hand signals will be used on site.

- Hand gripping throat - out of air, can't breathe
- Grip partners wrist or both hands around waist - leave area immediately
- Hands on top of head - need assistance
- Thumbs up - OK, I'm all right, I understand
- Thumbs down - No, negative

Telephone communication to the Command Post should be established as soon as practicable. The phone number is \_\_\_\_\_.

### B.2 DECONTAMINATION PROCEDURES

Personnel and equipment leaving the Exclusion Zone shall be thoroughly decontaminated. The standard level C decontamination protocol shall be used with the following decontamination stations: 1) equipment drop, 2) boot and glove rinse, 3) boot and glove removal, 4) canister change, 5) contaminated clothing removal, 6) field wash.

For all injuries, first attention will be given to the preservation of life. Should time permit before emergency transportation arrives, contaminated boots, gloves, coveralls, etc. will be removed to the extent possible.

The following decontamination equipment is required: plastic drop sheets, 30 gallon container with plastic liner, 20 gallon pressure spray bottle, hand and face wash basin, long-handled soft-bristled scrub brushes, bench or stool.

Detergent and water and/or \_\_\_\_\_ will be used as the decontamination solution.

### B.3 EMERGENCY PROCEDURES

The following standard emergency procedures will be used by on-site personnel. The Site Safety Officer will be notified of any on-site emergencies and be responsible for ensuring that the appropriate procedures are followed.

Personnel Injury in the Excavation Zone: Upon notification of an injury in the Exclusion Zone, the designated signal (horn blast) shall be sounded. The rescue team will enter the Exclusion Zone (if required) to remove the injured person. The Site Safety Officer and the Project Manager will evaluate the nature of the injury and the injured person will be decontaminated to the extent possible prior to removal to the Support Zone. The on-site EMT shall initiate the appropriate first aid and contact will be made with the ambulance and the designated medical facility (if required). No persons shall re-enter the Exclusion Zone until the cause of the injury or symptoms is determined.

Personnel Injury in the Support Zone: Upon notification of any injury in the Support Zone the on-site EMT will initiate the appropriate first aid and necessary follow-up. The Project Manager and the Site Safety Officer will assess the nature of the injury. If the cause of the injury or loss of the injured person does not affect the performance of the remaining site personnel, operations may continue. If the injury increases the risk to others, activities on-site will stop until the added risk is removed or minimized.

Fire/Explosion: Upon notification of a fire or explosion on-site, the designated emergency signal (fire alarm) will be sounded. The fire department will be alerted and all personnel moved to a safe distance from the involved area.

Personal Protective Equipment Failure: If any site worker experiences a failure or alteration of protective equipment that affects the level of protection afforded that employee, that person and his/her buddy will immediately leave the Exclusion Zone. Re-entry will not be permitted until the

equipment has been repaired or replaced.

Other Equipment Failure: If any other equipment on-site fails to operate properly, the Project Manager and the Site Safety Officer will be notified and will determine the effect of this failure on continuing operations at the site. If the failure affects the safety of personnel or prevents the completion of the Work Plan Tasks, all personnel will leave the Exclusion Zone until the situation is evaluated and appropriate actions taken.

Excavation: Excavation of all personnel on site will be conducted immediately without regard to equipment if extreme emergencies occur. In the event of a fire or significant spillage, emergency warning will be given by a single burst on the air horn. In the event that an excavation is necessary, three (3) bursts on the air horn will be given. All personnel should proceed to remove themselves outside the danger area through the closest upwind corridor if at all possible and assemble at a predesignated area. Wind direction should be determined in the field by observing flagging used to delineate contaminated area perimeters. When work activities are within the facility structure, each person should determine wind direction prior to entering the building.

#### Accidental Spillage

- a. Call for the assistance of all available crew members.
- b. Locate source of spillage and stop flow.
- c. Shut down related pumping operations.
- d. Contain spillage by diking and trenching.
- e. Recover as much spilled material as possible.
- f. Test area for extent of contamination.
- g. Notify County, State and Federal Agencies.

#### Accidental Toxic Gas Release:

- a. Notify all persons on site.
- b. Evacuate to upwind location.
- c. Monitor ambient air down wind.
- d. Notify emergency service personnel.

In all situations, when an on-site emergency results in evacuation of the Exclusion Zone, personnel will not re-enter until:

1. The conditions resulting in the emergency have been corrected.
2. The hazards have been reassessed.
3. The Site Safety Plan has been reviewed.
4. Site personnel have been briefed on any changes in the Site Safety Plan.

#### Public Information Procedure

In the event of emergency conditions, all relevant information will be provided to Mr. \_\_\_\_\_ the owner representative. Dissemination of information will be handled in a manner that insures a single spokesperson for all emergency conditions.

### B.4 DRUM HANDLING PROCEDURES

#### General Provisions

1. There is no substitute for common sense. If you are uncertain about anything in these guidelines ask questions first.
2. All drums and containers used during the clean-up will meet the appropriate DOT, OSHA, and EPA regulations for the wastes they contain.
3. Drums and containers will be inspected and their integrity will be assured prior to being moved. Drums or containers that cannot be inspected before being moved because of inaccessible storage conditions will be moved to an accessible location and inspected prior to further handling.



4. Unlabeled drums and containers will be considered to contain hazardous substances and handled accordingly until the contents are positively identified and labeled.
5. Site operations will be organized to minimize the amount of drum or container movement.
6. Prior to movement of drums or containers, all employees exposed to the transfer operation will be warned of the potential hazards associated with the contents of the drums or containers.
7. U.S. Department of Transportation specified salvage drums or containers and suitable quantities of proper absorbent will be kept available and used in areas where spills, leaks, or ruptures may occur.
8. Where major spills may occur, a spill containment program will be implemented to contain and isolate the entire volume of the hazardous substance being transferred.
9. Drums and containers that cannot be moved without rupture, leakage, or spillage will be emptied into a sound container using a device classified for the material being transferred.
10. A ground-penetrating system or appropriate type of detection system or device will be used to estimate the location and depth of drums or containers.
11. Soil and cover material will be removed with caution to prevent drum or container rupture.
12. Fire extinguishing equipment meeting the requirements of 29 CFR Part 1910, Subpart L will be on hand and ready for use to control small fires.

### Opening Drums and Containers

1. Where an airline respirator system is used, connections to the bank of air cylinders will be protected from contamination and the entire system will be protected from contamination.
2. Employees not actually involved in opening drums or containers will be kept at a safe distance from the drums or containers being opened.
3. If employees must work near or adjacent to drums or containers being opened, a suitable shield that does not interfere with the work operation will be placed between the employee and the drum or containers being opened to protect the employee in case of accidental explosion.
4. Controls for drum or container opening equipment, monitoring equipment, and fire suppression equipment will be located behind the explosion-resistant barrier.
5. Material handling equipment and hand tools will be of the type to prevent sources of ignition.
6. Drums and containers will be opened in such a manner that excess interior pressure will be safely relieved. If pressure cannot be relieved from a remote location, appropriate shielding will be placed between the employee and the drums or containers to reduce the risk of employee injury.
7. Employees will not stand upon or work from drums or containers.



January 13, 1992

APPENDIX B

CLOSURE COST ESTIMATE

January 13, 1992

COLUMBUS COATED FABRICS - CLOSURE PLAN

CLOSURE COST ESTIMATE

REMOVAL OF WASTE INVENTORY

150 drums @ non- transportation  
and treatment/disposal \$ 37,500

HWCSA CLEANING AND DECONTAMINATION

LABOR

Senior Professional 40 hrs. n 2,600  
Technicians 64 hrs. non- 2,560

EQUIPMENT AND MATERIALS

Steam cleaner, hose, vacuum rental 500  
Drums, tools, PPE 1,500

SUB-TOTAL 7,160

EQUIPMENT DECONTAMINATION

LABOR

Technicians 16 hrs. @ non- 640

SAMPLE COLLECTION/ANALYSIS

HWCSA FINAL RINSE

1 water sample @ non- 500

January 13, 1992

COLUMBUS COATED FABRICS - CLOSURE PLAN

CLOSURE COST ESTIMATE (CONT.)

CONTAINED DEBRIS AND WASH/RINSE WATER

1 solid sample @ non-	
(waste characterization)	750
2 water samples @ non-	
(waste characterization)	<u>1,300</u>

<u>SUB-TOTAL</u>	2,550
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DISPOSITION OF COLLECTED DEBRIS  
AND WASH/RINSE WATER

6 drums @ non- transportation and treatment disposal	900
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CLOSURE CERTIFICATION AND  
DOCUMENTATION REPORT

LABOR

Senior Professional 40 hrs. @ non-	2,600
Staff Professional 40 hrs. @ non-	1,600
Clerical and Drafting 40 hrs. @ non-	1,200
<u>REPORT REPRODUCTION AND GRAPHICS</u>	<u>250</u>

<u>SUB-TOTAL</u>	5,650
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non- Oversight and Management Cost	<u>8,160</u>
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<u>TOTAL ESTIMATED CLOSURE COST</u>	<u>\$ 62,560</u>
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